

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Massachusetts

United States of America
v.

Michael Williams, et al.

Defendant(s)

Case No. 10-117-LTS

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2009 through December 2, 2010 in the county of Suffolk, Norfolk, Middlesex, Ply in the
District of Massachusetts, the defendant(s) violated:

Code Section

21 USC Sec. 841(a)(1) and 846

Offense Description

Conspiracy to possess with intent to distribute and to distribute 500 grams or more of cocaine and 280 grams or more of cocaine base

This criminal complaint is based on these facts:
See attached Affidavit of Martin M. O'Malley, incorporated herein.

✓ Continued on the attached sheet.


Complainant's signature

Martin M. O'Malley, Task Force Officer, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 12/1/2010

Judge's signature

City and state: Boston, Massachusetts


Leo T. Sorokin, U. S. Magistrate Judge
Printed name and title

Mag. J. No. 10-117

AFFIDAVIT OF TASK FORCE OFFICER MARTIN M. O'MALLEY

I, Task Force Officer Martin M. O'Malley depose and state as follows:

I. INTRODUCTION

1. I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code. I have been employed as a Task Force Officer of the United States Drug Enforcement Administration ("DEA") since May 2010. I am currently assigned to the Boston Office of the New England Field Division.

2. I had served as a police officer in Boston, Massachusetts for nine years before I was promoted to the rank of detective. I served as a detective in the Special Investigations Unit of the Boston Police Department for three years. In May 2010, I was sworn in as Task Force Officer and began working with the United States Drug Enforcement Administration Task Force II in the New England Field Division based in Boston, Massachusetts.

3. During the course of my law enforcement career, I have directed and/or participated in the investigation of numerous narcotics cases, including the execution of numerous search warrants and monitoring of electronic surveillance. I have

participated in surveillance and undercover roles, and have made numerous arrests, conducted debriefings of defendants, and have testified in state and federal court.

4. My awareness of drug trafficking practices, as well as my knowledge of drug use and distribution techniques as set forth in this Affidavit, arise from the following: (a) my own involvement in prior drug investigations and searches during my career as a law enforcement officer, as previously described in the training and qualifications portion of this affidavit; (b) my involvement on a number of occasions in debriefing confidential informants and cooperating individuals in prior drug investigations, as well as what other agents and police officers have advised me when relating the substance of their similar debriefings and the results of their own drug investigations, more particularly described below; (c) from this particular investigation and other investigations involving the interception of wire communications pursuant to court authorized Title III wiretaps.

A. Overview of the Investigation

5. I have personally participated in the investigation of the subjects named in this Affidavit since July 2009. I am familiar with the facts and circumstances of this investigation not only from my own personal participation in the investigation, but also from oral and written reports made to me by other Agents

of the DEA, other federal, state and local law enforcement agencies and a review of transcripts of court-ordered intercepted conversations and summaries of such wiretap interceptions.

6. I am submitting this affidavit in support of a criminal complaint for the following individuals:

- (a) Eydris Adams, a/k/a "E", 71 Sawyer Avenue, Apartment 3, Dorchester, MA;
- (b) Debra Brown, 37 Havelock Street, Apartment #3, Dorchester, MA;
- (c) Frank Copeland, a/k/a Brito, 196 Greenfield Street, Dorchester, MA;
- (d) George Leary, 4 Thane Street, Dorchester, MA;
- (e) Ramon Lomax, a/k/a "Pete", 16 Warner Street, Dorchester, MA;
- (f) Anastacio Lopez, a/k/a "Francisco Cuevas", 60 Thetford Avenue, Apartment #2, Dorchester, MA;
- (g) Anthony Madden, 97 Radcliffe Street, Dorchester, MA;
- (h) Jerome Marion, 19 Brenton Street, Apartment #2, Dorchester, MA;
- (i) Nicole Moore, 132 Greenwood Street, Apartment #3, Dorchester, MA;
- (j) Ryan Morris, 15 Packard Way, Brockton, MA;
- (k) Miguel Angel Nouel, 302 Centre Street, Apartment #1, Jamaica Plain, MA;
- (l) Kervin Pena, 67 Washington Street, Apartment #11, Dorchester, MA;
- (m) Beverly Person, 8 Peacevale Road, Dorchester, MA;

- (n) Dwayne Person, 8 Peacevale Road, Dorchester, MA;
- (o) Shawn Walker, 82 Centre Street, Dorchester, MA;
- (p) Donald Williams, a/k/a "Ducky", 19 Brenton Street, Apartment #2, Dorchester, MA;
- (q) Noel Williams, 12 Nottingham Street, Dorchester, MA; and
- (r) Michael Williams, a/k/a "Muscle Mike", 10 Coffey Street, Apartment #2, Dorchester, MA,

charging that from in or about July, 2009, to on or about December 2, 2010, each did knowingly and intentionally combine, conspire, confederate and agree with each other and with others unknown to possess with intent to distribute and distribute more than 500 grams of cocaine and more than 280 grams of cocaine base, in violation of Title 21 United States Code, Sections 841(a)(1), 841(b)(1)(B) and 846. This affidavit does not contain all of the facts known to me as a result of my investigation; instead, it contains only those facts sufficient to establish the requisite probable cause for the criminal complaint.

III. SUMMARY OF EVIDENCE

A. Index of Probable Cause

7. Probable cause for issuance of a criminal complaint is set out throughout this Affidavit; for ease of reference, the

following is a paragraph index to the principle statements of probable cause for each of the defendants:

- (a) Eydris ADAMS - ¶¶ 6(a); 9; 171; 173; 175; 187; 188; and 189
- (b) Debra BROWN - ¶¶ 6(b); 50-53; 62; 66; 67; 70; 75; 76; 80; and 189
- (c) Frank COPELAND - ¶¶ 6(c); 88; 98-102; and 189
- (d) George LEARY - ¶¶ 6(d); 61; 79; 80; 115; and 189
- (e) Ramon LOMAX - ¶¶ 6(e); 39; 44; 54; 55; 60; 74; 116; and 189
- (f) Anastacio LOPEZ - ¶¶ 6(f); 9; 172-175; 187; 189
- (g) Anthony MADDEN - ¶¶ 6(g); 59; 64; 65; 72; 73; 117; and 189
- (h) Jerome MARION - ¶¶ 6(h); 11; 12; 16-18; 21; 25; 28; 29; 35; and 189
- (i) Nicole MOORE - ¶¶ 6(i); 39; 69; 81; 82; 83; 114; and 189
- (j) Ryan MORRIS - ¶¶ 6(j); 9; 56; 57; 68; 77; 78; 134; 135; 139; 140; 142-145; 147; 150; 151; 153; 155; 156; 158;

159; and 189

(k) Miguel Angel NOUEL - ¶¶ 6(k); 9; 133; 136; 137; 139; 141; 176; 177; 181-185; 187; and 189

(l) Kervin PENA - ¶¶ 6(l); 9; 127; 146; 149-152; 154-158; 160-168; and 189

(m) Beverly PERSON - ¶¶ 6(m); 9; 91; 131; 187-189

(n) Dwayne PERSON - Passim

(o) Shawn WALKER - ¶¶ 6(o); 89; 90; 96; 97; 113; and 189

(p) Donald WILLIAMS - ¶¶ 6(p); 9; 11; 12; 16; 17; 19-23; 27-36; and 189

(q) Noel WILLIAMS - ¶¶ 6(q); 9; 126; 127; 178;-180; and 189

(r) Michael WILLIAMS - Passim

B. Initiation of Investigation

8. This investigation began in July 2009, when an individual approached DEA agents with information about an entrenched, large-scale, financially successful, family-run cocaine and cocaine base business operating since the early 1990's out of 136 and 132 Greenwood Street, Dorchester,

Massachusetts. These two triple-decker houses are owned by the head of the distribution organization, Michael WILLIAMS, who currently owns and resides at 10 Coffey Street, Apartment #2, Dorchester, Massachusetts, and with his girlfriend, [REDACTED]

[REDACTED] CW-1 was involved in this business as a crack "cook" and as a cocaine distributor since the early 1990's, and approached DEA because s/he had become convinced that the cocaine business had destroyed CW-1's family and devastated the neighborhood¹. Agents have made a preliminary, conservative, estimate of the cocaine and crack distributed during the period of the Title III electronic surveillance. Agents believe that the conspirators distributed in excess of twenty (20) kilograms of cocaine and one (1) and one-half (½) kilograms of crack cocaine. Those quantities do not include the amounts sold by these individuals during the twenty years that many of them have been distributing cocaine in Dorchester, Massachusetts, nor does it include quantities that were not intercepted over one of the six phones that were subject to Title III electronic surveillance. Based on the investigation, including physical and electronic surveillance, as well as the quantity of cocaine and

¹ After the initiation of electronic surveillance on April 12, 2010, agents learned that, beginning on or about April 25, 2010, CW-1 was involved in the sale of narcotics. DEA immediately deactivated CW-1 but did not inform CW-1 of that fact to avoid compromising the electronic surveillance.

crack purchased during the charged conspiracy, all the charged defendants are distributors of cocaine and/or crack. Each charged defendant purchased crack and/or cocaine for the purpose of re-sale to customers.

9. Beginning in April 2010, the DEA initiated a series of wiretaps on a cellular telephone used by Donald "Ducky" WILLIAMS, of 19 Brenton Street, Apartment #2, Dorchester, Massachusetts ("Target Telephone #1") (M.B.D. No. 10-113). The investigation showed that Donald WILLIAMS worked for his cousin Michael WILLIAMS as a crack "cook," who made cocaine into crack for distribution to customers. Agents thereafter identified two cellular telephone numbers used by Michael WILLIAMS in furtherance of his drug distribution organization ("Target Telephone #2" and "Target Telephone #3"). Agents obtained court authorization for the interceptions of Target Telephones #2 and #3 in May 2010, and June 2010 (M.B.D. No. 10-113). While intercepting Target Telephone #3, agents identified at least two of Michael WILLIAMS's sources of cocaine supply as Dwayne PERSON, of 8 Peacevale Road, Dorchester, Massachusetts, and Ryan MORRIS, of 15 Packard Way, Brockton, Massachusetts. In August 2010, agents sought, and obtained, court-authorization for the interception of a cellular telephone used by Dwayne PERSON ("Target Telephone #4") (M.B.D. No. 10-113). During the interception of Target Telephone #4, agents identified at least

four of Dwayne PERSON's sources of cocaine supply as Miguel Angel NOUEL of 302 Centre Street, Apartment #1, Jamaica Plain, Massachusetts, Kervin PENA of 67 Washington Street, Apartment #11, Dorchester, Massachusetts, Noel WILLIAMS of 12 Nottingham Street, Apartment 12A, Dorchester, Massachusetts, and Anastacio LOPEZ, of 60 Thetford Avenue, Apartment #2, Dorchester, Massachusetts. Dwayne PERSON was arrested on November 10, 2010, immediately after he purchased 5 kilograms of cocaine from Miguel Angel NOUEL. Since that time, taped jail calls between Dwayne PERSON and his wife, Beverly PERSON, have showed that she has been aiding and abetting the collection of drug proceeds for Dwayne PERSON. The jail calls have also shown that Dwayne PERSON instructed Beverly PERSON to rely on Eydris ADAMS of 71 Sawyer Avenue, Apartment 3, Dorchester, Massachusetts, to act as her "enforcer" in collecting drug proceeds. In addition, Dwayne PERSON instructed Eydris ADAMS to meet with Michael WILLIAMS for help in collecting bail money.

C. The Cooperating Witness

10. The cooperating witness ("CW-1") has been working with DEA and BPD since August 2009, and has received small monetary payments for his services and expenses. DEA has corroborated most of CW-1's information through the use of physical, video and electronic surveillance, telephone records, controlled crack

purchases, recorded telephone conversations, and other sources of information.

11. CW-1 made consensually recorded conversations with Michael WILLIAMS, Donald WILLIAMS, and others, and made three controlled purchases of crack cocaine: one from Jerome MARION of 19 Brenton Street, Apartment #2, Dorchester, Massachusetts; and two from Donald WILLIAMS, who currently resides with Jerome MARION at 19 Brenton Street, Apartment #2, Dorchester, Massachusetts.

12. By way of background, CW-1 explained that s/he had worked for Michael WILLIAMS from the early 1990's until recently as a crack cook. For that same period of time, CW-1 also sold crack cocaine for (and bought crack cocaine from) Michael WILLIAMS and his associates. According to CW-1, Michael WILLIAMS is the head of the family-run organization. CW-1 identified Michael WILLIAMS' principle workers as his cousin, Donald WILLIAMS and a neighbor, Jerome MARION. CW-1 stated that although Michael WILLIAMS was in charge, he had delegated to Donald WILLIAMS the day-to-day responsibility of running the business.

13. According to CW-1, during the period s/he worked for Michael WILLIAMS, Michael WILLIAMS personally brought kilograms of cocaine to 136 Greenwood Street, Apartment 3, Dorchester,

Massachusetts and dropped them off for CW-1 to cook into crack for retail distribution. CW-1 believed that Michael WILLIAMS distributed kilograms of powder cocaine to large-scale customers whose identities were unknown to CW-1. CW-1 has seen Michael WILLIAMS in possession of as many as 20-25 kilograms of cocaine. In addition, CW-1 has observed Michael WILLIAMS with at least three different firearms: a Mach 10, a Glock 40, and a 9mm. CW-1 has seen WILLIAMS in possession of at least \$100,000 in cash.

14. This investigation has shown that Michael WILLIAMS owns and resides in 10 Coffey Street, Apartment 2, Dorchester, Massachusetts. Michael WILLIAMS also owns 132 Greenwood Street, Apartments 1, 2 and 3, as well as 136 Greenwood Street, Apartments 1, 2, and 3. 136 Greenwood Street is guarded by a heavy-gauge chain-link fence surrounding the property. There is one opening at a closed rollaway gate. Typically, when a cocaine customer arrived at 136 Greenwood Street, a lookout employed by Michael WILLIAMS opened the gate, let the person enter, and then closed the gate afterwards. The gate extends across the driveway, so that both vehicles and pedestrians go through the same entrance process.

15. CW-1 believes that Michael WILLIAMS launders his drug money with the assistance of four women, identified as [REDACTED]

[REDACTED]

[REDACTED] According to CW-1, Nicole Willis is Michael WILLIAMS' current girlfriend and the mother of two of his six children. Throughout the course of the investigation, I have learned through physical surveillance and the use of cell cite location information, that Michael WILLIAMS resides at both 10 Coffey Street, Apartment #2, and with [REDACTED]
[REDACTED]

16. On December 30, 2009, agents showed CW-1 a photographic array consisting of 16 photographs, and asked if CW-1 could identify any of them. CW-1 immediately identified a Registry of Motor Vehicles photograph of Michael WILLIAMS of 10 Coffey Street, Apartment 2, Dorchester, Massachusetts, as the individual CW-1 knew as Michael WILLIAMS. The following day, December 31, 2009, CW-1 also identified a redacted Boston Police Department booking photo of Donald WILLIAMS as the individual CW-1 knew as "Duck." CW-1 identified Jerome MARION of 19 Brenton Street, Apartment 2, Dorchester, Massachusetts from a Registry of Motor Vehicles photograph as the person CW-1 knew as "Rome."

Controlled Purchases of Crack Cocaine By CW-1²

² During the period between December 1, 2009 and December 4, 2009, CW-1 also made three unrelated controlled purchases at the direction of DEA agents for DEA's Domestic Monitoring Program. The sources for these purchases were unidentified and no prosecution will result. The purpose of such random purchases is to monitor the street price of specific controlled substances in

September 9, 2009

17. CW-1 told agents that Donald WILLIAMS used Target Telephone #1 to conduct his drug business. Accordingly, on September 9, 2009, while under the direction of law enforcement agents, CW-1 dialed Target Telephone #1 to contact Donald WILLIAMS to arrange a drug transaction.³ At approximately 4:15 PM, law enforcement agents met CW-1 for the purpose of making a controlled purchase of crack cocaine from Donald WILLIAMS. Agents gave CW-1 \$170 in official government currency, employed the procedures described in footnote 3, and observed as CW-1 dialed Target Telephone #1, and spoke with Donald WILLIAMS. CW-1 told Donald WILLIAMS that s/he was on the way over. CW-1 was discharged in the area of 136 Greenwood Street, where surveillance agents had already located. Surveillance agents observed CW-1 meet with Donald WILLIAMS and Jerome MARION outside of 136 Greenwood Street. CW-1 entered 136 Greenwood Street through the side entrance and met with Jerome MARION. CW-1 then departed from the area and met with agents at a pre-determined

various cities throughout the United States.

³Prior to each of the buys described, agents first searched CW-1 for money or contraband, provided CW-1 with a transmitter, and provided CW-1 with a set amount of Official Government Currency ("OGC") to make the purchase. After each of the buys, agents searched CW-1 and retrieved any unused OGC, and the drugs and transmitter. Each of the buys was also surveilled by law enforcement.

location, where CW-1 gave the agents \$20 and an eightball of crack in a baggie. CW-1 was searched for contraband with negative results. The baggie and its contents were submitted for analysis to the DEA Northeast Laboratory, which confirmed it to be 3.5 grams of 22.4% pure cocaine base.

18. In a later debriefing, CW-1 stated that initially s/he had gone to the third floor of 136 Greenwood Street to see Michael WILLIAMS, but Michael WILLIAMS told CW-1 to wait, so CW-1 went outside to see if Jerome MARION knew whether Michael WILLIAMS "had anything." Jerome MARION walked to the front of 136 Greenwood Street and returned and gave CW-1 an eightball in exchange for \$150.

December 18, 2009

19. On December 16, 2009, at approximately 2:30 PM, CW-1 made a consensually recorded telephone call to Donald WILLIAMS on Target Telephone #1, and told Donald WILLIAMS s/he wanted to see him in a couple of days for an "8". Donald WILLIAMS responded: "Just come by". According to CW-1, s/he had requested an eightball of crack cocaine and had been instructed by Donald WILLIAMS to come to 132 Greenwood Street. That transaction was not completed that day.

20. On December 18, 2009, CW-1 arranged to meet Donald

WILLIAMS in a couple of minutes. Agents gave CW-1 \$150 in official government currency, employed the procedures described in footnote 3, and followed CW-1 to 132 Greenwood Street, where surveillance agents were located. That meeting was consensually recorded. At approximately 2:05 PM, surveillance agents observed CW-1 walk toward 132 Greenwood Street, then enter the porch area, where he spoke briefly to an unidentified male. Agents then observed CW-1 enter the home, and exit at approximately 2:16 PM. CW-1 met with agents at a pre-determined location, where CW-1 handed them one individually-wrapped bag of what appeared to be crack cocaine, and was searched for additional contraband with negative results. The substance was submitted to DEA's Northeast Laboratory for analysis, which determined it to be 2.5 grams of 45.9% pure cocaine base.

21. At a later debriefing, CW-1 said that s/he had been met on the porch of 132 Greenwood Street by [REDACTED], who directed him to Apartment 2. CW-1 went upstairs and met Donald WILLIAMS in Apartment 2. Donald WILLIAMS told CW-1 that he just made them up, but they were across the street on Rome's (Jerome MARION's) kitchen table. According to CW-1, Donald WILLIAMS left 132 Greenwood Street, went across the street to Rome's apartment at 19 Brenton Street, Apartment 2 and then returned to 132 Greenwood Street, Apartment 2 with a baggie,

which he handed to CW-1 in exchange for \$150.

March 24, 2010

22. On March 24, 2010, at approximately 3:20 PM, law enforcement agents met CW-1 for the purpose of making a controlled purchase of crack cocaine from Donald WILLIAMS. Agents provided CW-1 with \$150 in official government currency and followed the procedures set out in footnote 3.

23. CW-1 placed a consensually recorded telephone call to Donald WILLIAMS on Target Telephone #1 and asked Donald WILLIAMS for an eightball. Donald WILLIAMS told CW-1 to "come by" at 4PM. Agents set up surveillance in the area of 132 Greenwood Street, and discharged CW-1 in the area to meet with Donald WILLIAMS. Surveillance agents observed CW-1 meet with an individual identified as Donald WILLIAMS in front of 132 Greenwood Street. CW-1 spoke briefly with Donald WILLIAMS on the porch, after which surveillance agents observed Donald WILLIAMS cross Greenwood Street to the area of 19 Brenton Street. Donald WILLIAMS returned a minute later to 132 Greenwood Street and met with CW-1.

24. Surveillance agents observed CW-1 depart from the area, and met CW-1 at a pre-determined location, where CW-1 gave agents

a can of Walgreens cashew halves, which contained plastic baggie holding what appeared to be an eightball. CW-1 was searched for contraband with negative results. In a later debriefing, CW-1 said that, when CW-1 arrived at 132 Greenwood Street, "Duck" told CW-1 that he had to meet "Rome," whereupon "Duck" crossed the street, returned, and handed CW-1 the can of nuts containing the eightball in exchange for \$150. The substance in the baggie field-tested positive for cocaine. Laboratory analysis determined that the substance was 3.5 grams of 73.1% cocaine base.

D. Interception of Target Telephone #1

25. On April 9, 2010 and May 11, 2010, Task Force Officer Paul M. Gallagher filed Affidavits in support of Applications by Assistant U.S. Attorney Heidi E. Brieger in support of Orders Authorizing Initial Interception of Wire Communications Over (617) 901-5405 ("Target Telephone #1"). The Court authorized the interception of wire communications over a cellular telephone number 617-901-5405 used by Target Subject Donald "Ducky" WILLIAMS, and subscribed to in the name of Jerome MARION, 19 Brenton Street, Apartment 2, Dorchester, Massachusetts ("Target Telephone #1").

26. During the electronic surveillance of Target Telephone #1, revealed Donald WILLIAMS resided at 19 Brenton Street,

Apartment #2, Dorchester, Massachusetts, 02122.

27. As the intercepted telephone conversations below illustrate, agents believe that shortly after interceptions began, Michael WILLIAMS became suspicious that his family and/or employers were disloyal, so he "shut down" his cocaine business in the Greenwood Street neighborhood, and stopped supplying Donald WILLIAMS with cocaine. Donald WILLIAMS was thereafter forced to find alternate sources of cocaine supply.

28. On April 13, 2010, at approximately 6:12 PM, monitors intercepted a call from Donald WILLIAMS on Target Telephone #1 to Jerome MARION on 617-901-4990, subscribed to in the name of Jerome Marion, 19 Brenton Street, #2, Dorchester, Massachusetts ("the Marion Phone"). Donald WILLIAMS told MARION that "Greenwood is over." MARION replied that "your boy (referring to Michael WILLIAMS) is "shutting down the block." Donald WILLIAMS agreed.

29. On April 15, 2010, at approximately 2:23 PM, Donald WILLIAMS called Jerome MARION on Target Telephone #1 to tell him that: "Nigga ain't fucking with nobody. Even niggas who don't owe him (Michael WILLIAMS) cash. We're officially on our ass." Agents believe that this conversation referred to the fact that Michael WILLIAMS would not do drug business with anyone in

Greenwood Street, even customers who were paid up and owed him no money. Agents believed that when Donald WILLIAMS said "on our ass," he meant that they were out of cocaine.

30. On April 17, 2010, at approximately 4:42 PM, monitors intercepted a conversation between Donald WILLIAMS on Target Telephone #1 and Michael WILLIAMS on Target Telephone #2. During the conversation, Michael WILLIAMS and Donald WILLIAMS discussed the "keys" that were stolen out of the yard at 136 Greenwood Street. Based on information from CW-1, I believe that approximately one kilogram of Michael WILLIAMS' cocaine was stolen out of the yard at 136 Greenwood Street in December, 2009. During this intercepted call, Donald WILLIAMS tried to assure Michael WILLIAMS that he, Donald, had nothing to do with the theft of the cocaine.

31. On May 12, 2010, at approximately 3:03 PM, monitors intercepted a conversation on Target Telephone #1 between Donald WILLIAMS and [REDACTED]
[REDACTED]

During their conversation, Donald WILLIAMS said to [REDACTED]
[REDACTED] everything good, man, but it's at one sixty-five." Donald WILLIAMS then told [REDACTED] "Man, [REDACTED] you know motherfuckers can't find nothing. Motherfuckers over-charging right now." [REDACTED]
[REDACTED] responded, "alright." Donald WILLIAMS said, "It was one

seventy-five, but I got (U/I) the dude down so, we can only go to one sixty-five. So, that's what it is." [REDACTED] responded, "Alright, I'll let you know." I believe that Donald WILLIAMS had located an eightball of crack cocaine for [REDACTED] and called to tell him the price. The reference to not being able "to find anything" referred to the fact that there was not much cocaine available, so the prices were higher ("motherfuckers overcharging.")

32. On May 13, 2010, at approximately 11:53 AM, monitors intercepted a call from Donald WILLIAMS on Target Telephone #1 to Michael WILLIAMS on Target Telephone #2:

Donald WILLIAMS: Yo, you said what?

Michael WILLIAMS: I said, Pops said you had called him and told him that you had something.

Donald WILLIAMS: No, I didn't, no. What I, when I called him yesterday, he asked me. He said, um, um, well matter of fact I hadn't seen Pops the last fucking two days or whatever. He was like, "what's going on?" I said, no, I can't get nothing. I said, I know people that got something or whatever. But you know what I'm saying? Like, OK, if Mike (Michael WILLIAMS) isn't dealing with you, or whatever, I'm not going ... that fucking route. ...

Michael WILLIAMS: Alright, well that's what was told to me.

...

Donald WILLIAMS: ... I'll be back in the hood in a second. We can go there together.

Michael WILLIAMS: I'm not even over there. I already bounced

from other there.

Donald WILLIAMS: ... When I get there I call you and we can go there together.

33. During the conversation, I believe that Michael WILLIAMS expressed anger that Donald WILLIAMS had attempted to sell crack to [REDACTED] because Michael WILLIAMS wanted no one to distribute or purchase crack in the Greenwood Street neighborhood. In addition, I believe that Michael WILLIAMS suspected that one or more of his workers or family members may have been involved in the theft of cocaine from the backyard of 136 Greenwood Street. During the phone call, I further believe that Donald WILLIAMS and Michael WILLIAMS arranged to meet at 136 Greenwood Street.

34. Almost immediately, at approximately 11:59 AM, Donald WILLIAMS placed a call on Target Telephone #1 to [REDACTED]. Donald WILLIAMS asked [REDACTED] why would you go tell Mike (Michael WILLIAMS) that I told you that I could get you some?" [REDACTED] responded, "Duck, I didn't tell Mike nuttin'. Mike called me about it. I didn't tell Mike nuttin'." I believe that this call, and the others following, were Donald WILLIAMS's attempt to locate the person who may have told Michael WILLIAMS about Donald WILLIAMS's attempt to disobey Michael WILLIAMS and sell cocaine on Greenwood Street.

35. Moments later, at approximately 12:22 PM, Donald WILLIAMS placed a call on Target Telephone #1 to Jerome MARION to determine whether it had been Jerome MARION who had reported Donald WILLIAMS' crack negotiations to Michael WILLIAMS. Donald WILLIAMS said, "You didn't tell MIZ (Michael WILLIAMS) that I um, had a connect, right?" Twice Jerome MARION said, "What?" After Donald WILLIAMS repeated the question, Jerome MARION responded, "U/I telling MIZ nothing." Donald WILLIAMS then described Michael WILLIAMS' previous call to Donald WILLIAMS, and said, "I'm just asking. No, I was just asking. It ain't nuttin'."

36. Shortly thereafter, at approximately 1:27 PM, Donald WILLIAMS called Michael WILLIAMS on Target Telephone #2. Donald WILLIAMS said, "I'm on my way to the Wood right now." Michael WILLIAMS responded: "I'll be over there. I'll be back over there in a little while. I'm in the middle of something right at this moment. ... Yo, I'll be over there." I believe that the two intended to meet at "the Wood" (referring to Greenwood Street) to discuss the situation with [REDACTED]

37. DEA's pole camera set up outside 136 Greenwood Street captured images of the May 13, 2010, meeting, which took place on the rear deck of 136 Greenwood Street at approximately 3:25 PM. The meeting was attended by Michael WILLIAMS, Donald WILLIAMS,

[REDACTED] Based on the video

surveillance, the meeting was contentious, accompanied by lots of finger pointing and agitated movements by the participants. The meeting lasted until approximately 5:50 PM. Based on the post-meeting interceptions over Target Telephone #1, I believe that Michael WILLIAMS reiterated his "stop work order" during the meeting, thereby preventing the further distribution of his crack on Greenwood Street.

E. Interception of Target Telephone #2

38. On May 28, 2010, June 29, 2010, July 28, 2010, and August 26, 2010, Task Force Officer Paul M. Gallagher filed Affidavits in support of Applications by Assistant U.S. Attorney Heidi E. Brieger in support of Orders Authorizing Interception of Wire Communications Over (857) 336-0356 ("Target Telephone #2"). The Court authorized the interception of wire communications over a cellular telephone used by Target Subject Michael WILLIAMS, 857-366-0356, subscribed to in the name of Michael WILLIAMS, 10 Coffey Street, Apartment 2, Dorchester, Massachusetts ("Target Telephone #2").

39. On May 29, 2010, at approximately 2:28 PM, Michael WILLIAMS used Target Telephone #2 to call 857-251-3209, subscribed to in the name of Nicole Moore, 8 Kingsdale Street, apartment #3, Dorchester, MA, and spoke to an unidentified

female. During the conversation, Michael WILLIAMS received an incoming call on Target Telephone #2 from 617-202-1470, with unknown subscriber information (hereinafter, the "Lomax Phone"), and spoke to a male, later identified as Ramon LOMAX, a/k/a "Pete."

Michael WILLIAMS: "What's up Pete?"

UM "Pete": "Hey, hey, hey, what's going Mike?"

Michael WILLIAMS: "Yo."

UM "Pete": "Can I bother for one and one?"

Michael WILLIAMS: "Yes you can. I'll see you very, very shortly. You there?"

UM "Pete": "Yeah, I'm in the house."

Michael WILLIAMS: "Alright, I be there in about, probably like (five to seven minutes)."

UM "Pete": "Thank you, thank you, thank you."

40. At approximately 8:41 PM, Michael WILLIAMS, received an incoming call on Target Telephone #2, from the PETE Phone and spoke to an unidentified male believed to be "Pete:"

Michael WILLIAMS: "Yes, sir."

UM: "Ahhh, whenever you ready..."

Michael WILLIAMS: "Number?"

UM: "Um, remember, I asked you for them two?"

Michael WILLIAMS: "Alright, I'll see you shortly."

UM: "Okay, I, I don't need it right this second I was just (unintelligible)..."

41. At approximately 8:59 PM, Michael WILLIAMS placed an outgoing call on Target Telephone #2, to the "Pete" Phone and spoke to an unidentified male believed a/k/a "Pete."

UM: (unintelligible)

Michael WILLIAMS: "Yeah, be outside Pete, I'm getting ready to come through there now."

UM: "Ahhhh, psss, alrighty."

Michael WILLIAMS: "Alright"

UM: "Um, remember, I asked you for them two?"

Michael WILLIAMS: "Alright, I'll see you shortly."

UM: "Okay, I, I don't need it right this second I was just (unintelligible)..."

42. Agents believe that "Pete" ordered controlled substances, possibly an eightball of crack cocaine and an eightball of powder cocaine, from Michael WILLIAMS when he asked if he could get "one and one." Agents further believe that Michael WILLIAMS delivered the cocaine to "Pete."

43. On May 30, 2010, at approximately 2:39 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from Tony MADDEN using 617-514-3325, subscribed to in the name of [REDACTED] 97 Radcliffe Street apartment #1, Dorchester, MA (hereinafter the MADDEN phone). Tony said he would have what he owed Michael WILLIAMS in fifteen minutes. Michael WILLIAMS asked Tony what he owed him. Tony replied, "the two-five." Michael WILLIAMS responded, "oh, the big thing," and told Tony that he would wait for his call. Agents believe that Tony MADDEN owed Michael WILLIAMS \$2,500 for 62 grams of cocaine.

44. At approximately 6:22 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from the Lomax Phone, and spoke to Ramon LOMAX, a/k/a "Pete." "Pete" asked Michael WILLIAMS if he could, "get two the hard way." Michael WILLIAMS replied, "yeah, I'll get with you in a little bit, I'm actually with my family right now. Soon as I get done, I'll call you." "Pete" replied, "thank you, thank you." Agents believe that "Pete" ordered controlled substances from Michael WILLIAMS.

45. At approximately 7:38 PM, Michael WILLIAMS called the Lomax Phone on Target Telephone #2, and spoke with an unidentified male, believed to be "Pete."

UM: "Hello?"

Michael WILLIAMS: "Hey Pete."

UM: "Yes cuz?"

Michael WILLIAMS: "You ready for me?"

UM: "I am when you are."

Michael WILLIAMS: "Okay, (unintelligible) and come out."

UM: "I'm on the (unintelligible) but let me run and get it together. I'll come right out."

Michael WILLIAMS: "Alright."

UM: "Alright."

46. Agents believe that "Pete" ordered a quantity of controlled substances from Michael WILLIAMS and Michael WILLIAMS delivered it to "Pete."

47. On May 31, 2010, at approximately 4:51 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from Tony MADDEN on the MADDEN phone. Tony MADDEN asked Michael WILLIAMS if he could meet Michael WILLIAMS. Michael WILLIAMS agreed, and told Tony MADDEN that he would meet him in a few minutes when he was headed "that way." Agents believe that Tony MADDEN arranged with Michael WILLIAMS to give him approximately \$1,100 to pay a drug-related debt.

48. At approximately, 5:02 PM, Michael WILLIAMS used Target Telephone #2 to call Tony MADDEN on the MADDEN phone. Michael WILLIAMS told Tony MADDEN, "go down to the bottom like yesterday," and Tony MADDEN agreed.

49. At approximately, 10:07 PM, Michael WILLIAMS received an incoming call on Target Telephone #2 from Tony MADDEN on the MADDEN phone. Tony MADDEN told Michael WILLIAMS that he had six he owed Michael WILLIAMS. Michael WILLIAMS told Tony MADDEN that he would talk with him in a few minutes and to meet him at the "bottom." Agents believe that Tony MADDEN told Michael WILLIAMS that he had additional money to pay Michael WILLIAMS.

50. On June 1, 2010, at approximately 12:39 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from Debra BROWN, on 617-595-0772, subscribed to Debra Brown, 37 Havelock Street, apartment #2, Dorchester, MA (hereinafter the "BROWN Phone"). Debra Brown told Michael WILLIAMS that she wanted "one and one." Michael WILLIAMS told her he would call her when he was around. Agents believe that Debra BROWN requested a quantity of crack cocaine and a quantity of cocaine powder.

51. At approximately 2:09 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from the BROWN Phone and spoke to Debra BROWN. Michael WILLIAMS told Debra BROWN that he would be there in "a little bit."

52. At approximately 3:21 PM, Michael WILLIAMS placed a call using Target Telephone #2 to the BROWN Phone, and spoke to

Debra BROWN. Michael WILLIAMS told her to walk to the corner, and asked her if she had requested "one and one." Agents believe that Michael WILLIAMS confirmed her order a quantity of crack cocaine and a quantity of cocaine powder.

53. At approximately 8:12 PM, Michael WILLIAMS received a call on Target Telephone #2 from the BROWN Phone, and spoke to Debra BROWN who requested, "one the hard way." Michael WILLIAMS told Debra BROWN that he would be there in five minutes. Agents believe that Michael WILLIAMS agreed to supply Debra BROWN with a quantity of crack cocaine.

54. On June 2, 2010, at approximately 9:14 AM, Michael WILLIAMS placed a call using Target Telephone #2 to the Lomax Phone. Michael WILLIAMS spoke to Ramon LOMAX and asked him what the number was. The unidentified male replied, "two, rough." Michael WILLIAMS told him that he would see him in ten minutes. Agents believe that Michael WILLIAMS agreed to supply the unidentified male with a quantity of crack cocaine.

55. At approximately 9:35 AM, Michael WILLIAMS placed a call using Target Telephone #2 to the Lomax Phone. Michael WILLIAMS spoke to Ramon LOMAX, and told him to be outside because Michael WILLIAMS was coming that way. Agents believe that Michael WILLIAMS delivered Ramon LOMAX a quantity of crack

cocaine.

56. Based on physical surveillance conducted during the electronic surveillance of Target Telephone #2, Michael WILLIAMS alternated living between 10 Coffey Street, Apartment #2, Dorchester, Massachusetts, and 108 Sumner Street, Apartment #2, Quincy, Massachusetts, and used 136 Greenwood Street, Apartment #3, to "cook" cocaine into cocaine base and 132 Greenwood Street, Apartment #3, to store quantities of cocaine base. Michael WILLIAMS distributed quantities of cocaine and cocaine base to numerous customers who called him on Target Telephone #2 to place orders. Michael WILLIAMS then delivered the requested quantity to the customer's residence. One such customer was identified as Ryan MORRIS of 15 Packard Way, Brockton, Massachusetts, who was also one of Michael WILLIAMS' alternate sources of cocaine supply.

57. For example, on June 8, 2010, at approximately 2:22 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to 857-251-3096, subscribed to in the name of [REDACTED] 1 Main Street, Brockton, Massachusetts, known to be used by Jason MORRIS ("the Morris Phone"), and spoke to a male, later identified through physical surveillance as Ryan MORRIS. Ryan MORRIS told Michael WILLIAMS that he had to "pay the bill." Michael WILLIAMS replied that he was "trying to make a move now."

At approximately 2:38 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to the Morris Phone and spoke to Ryan MORRIS, who told Michael WILLIAMS that he wanted "two." Michael WILLIAMS told Ryan MORRIS that he only had "one," and would not have the other until tomorrow. Ryan MORRIS told Michael WILLIAMS that he would "grab" whatever Michael WILLIAMS had and be ready in twenty minutes. Michael WILLIAMS told Ryan MORRIS that he had "it" with him, "the one," but he did not have "double that." I believe that Ryan MORRIS placed an order for a quantity of drugs, but Michael WILLIAMS could only fill half of the order that day and would fill the other half the following day.

58. On June 9, 2010, at approximately, 2:50 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from 857-350-5250, subscribed to in the name of [REDACTED] and spoke to [REDACTED] [REDACTED] Michael WILLIAMS told [REDACTED] "I'm at home, but my hands are dirty, I'm washing it." I believe that the telephone call referred to the fact that Michael WILLIAMS had replenished his supply of cocaine and was at his house "cooking" the powder cocaine into crack before he could distribute it.

59. On June 22, 2010, surveillance agents learned that monitors had intercepted a conversation between Michael WILLIAMS

and Anthony MADDEN concerning a planned transaction for "one." Agents established in the area of Radcliffe Street, where they observed at approximately 6:18 PM, Anthony MADDEN approach Michael WILLIAMS in his black Jeep, bearing Massachusetts registration number 32GE61 (the "Black Jeep"). Surveillance agents observed Michael WILLIAMS hand an item to Anthony MADDEN before Michael WILLIAMS drove off in the Black Jeep.

60. On June 30, 2010, at approximately 2:22 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the LOMAX Phone and spoke to Ramon LOMAX a/k/a "Pete." "Pete" asked Michael WILLIAMS if he ("Pete") could get "three." Michael WILLIAMS replied, "yea," and "Pete" stated, "I'll leave it in the thing." Agents believe that Michael WILLIAMS agreed to supply "Pete" with a quantity of cocaine and that "Pete" would leave money for the quantity of cocaine somewhere for Michael WILLIAMS to pick up.

61. On June 26, 2010, surveillance agents learned that George LEARY had been intercepted over Target Telephone #3 ordering "8" from Michael WILLIAMS. Agents established surveillance in the area of 4 Thane Street, George LEARY's residence. Surveillance agents observed, at approximately 5:19 PM, Michael WILLIAMS arrive in the Black Jeep. George LEARY approached the Black Jeep, and surveillance agents observed

George LEARY retrieve an item from Michael WILLIAMS at the driver's side window. Before Michael WILLIAMS drove away, agents observe that he tossed an item out of the window. Agents retrieved that item, which was a plastic baggie with white residue inside. That baggie was submitted to the DEA Laboratory for analysis, which determined that the white residue was cocaine hydrochloride.

62. On July 1, 2010, at approximately 12:44 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from the BROWN phone and spoke to Debra BROWN, who asked Michael WILLIAMS for, "one and one baby." Michael WILLIAMS responded, "not free, not free yet, soon as I get free, I'll call you." Agents believe that Michael WILLIAMS was not able to supply Debra BROWN with the quantity of cocaine that she wanted, but would call her when he could.

63. At approximately 1:26 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to the LOMAX phone and spoke to "Pete" who asked Michael WILLIAMS for "three the rough way." Agents believe that "Pete" placed an order for a quantity of crack cocaine from Michael WILLIAMS.

64. At approximately 2:02 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from the Madden Phone, and

spoke to Anthony MADDEN, who told Michael WILLIAMS that he had the "four fifty" he (Anthony MADDEN) owed Michael WILLIAMS. Michael WILLIAMS told Anthony MADDEN that he could call him when he got "over there" so that Anthony MADDEN could meet Michael WILLIAMS at "the bottom."

65. At approximately 2:11 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to the MADDEN Phone and spoke to Anthony MADDEN. Michael WILLIAMS told Anthony MADDEN to, "meet me there in five minutes." Agents believe that Anthony MADDEN was paying off a drug debt that he owed to Michael WILLIAMS.

66. At approximately 2:47 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to the BROWN Phone and told Debra BROWN he was "on the way." Debra BROWN replied that she was "ready for him."

67. At approximately 7:12 PM, Michael WILLIAMS placed a telephone call over Target Telephone #2 to the BROWN Phone and told Debra BROWN that he was, "about to pull up." Agents believe that Michael WILLIAMS delivered the quantity of cocaine that Debra BROWN ordered from him earlier in the day.

68. On July 5, 2010, at approximately 8:41 PM, Michael WILLIAMS placed a telephone call on Target Telephone #2 to the

MORRIS Phone, and spoke to Ryan MORRIS, who told Michael WILLIAMS that he would like to "hook up" with Michael WILLIAMS and "drop off" whatever Michael WILLIAMS picked up. At approximately 10:10 PM, Michael WILLIAMS placed another telephone call to the MORRIS Phone and told Ryan MORRIS where to park. At approximately 10:15 PM, Michael WILLIAMS spoke to Ryan MORRIS over Target Telephone #2 and told Ryan MORRIS that he was at "the old spot." Ryan MORRIS replied, "Ash?," Michael WILLIAMS replied, "yeah." Ryan MORRIS told Michael WILLIAMS to drive down "Ocean Street." I believe that Michael WILLIAMS delivered a quantity of cocaine to Ryan MORRIS.

69. On July 10, 2010, at approximately 6:24 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from 857-251-3209, subscribed to in the name Nicole MOORE, 8 Kingsdale Street, Apartment 3, Dorchester, Massachusetts (the "Moore Phone"), and spoke to a woman, later identified through physical surveillance, as Nicole MOORE of 132 Greenwood Street, Apartment 3, Dorchester, Massachusetts. Michael WILLIAMS told Nicole MOORE about a police vehicle that followed him, and said that if "they" tried to pull him over he would "take off" and "they" would be unable to catch him. Michael WILLIAMS also said that he was about to "handle some shit." I believe that Michael WILLIAMS told Nicole MOORE that he was fearful that law enforcement would attempt to stop him and that he would flee if he had the

opportunity.

70. On July 13, 2010, at approximately, 8:50 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from 617-595-0772, subscribed to in the name of Debra Brown, 37 Havelock Street, Apartment #2, Dorchester, Massachusetts, and spoke to Debra BROWN. Michael WILLIAMS asked Debra BROWN what she needed and she replied, "one the hard way." Shortly afterwards, at approximately 9:03 PM, Michael WILLIAMS placed another telephone call on Target Telephone #2 to the same number and again spoke to Debra BROWN. Agents believe that Michael WILLIAMS supplied Debra BROWN with a quantity of crack cocaine. Agents do not have sufficient information as of this time to determine the quantity of the transaction.

71. On July 15, 2010, at approximately 9:35 AM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Lomax Phone, and spoke to "Pete". Michael WILLIAMS asked "Pete," if he was looking for the "same as yesterday." "Pete" responded, "yes." Michael WILLIAMS asked, "two times?" Again, "Pete" responded, "yes." Michael WILLIAMS told "Pete" to "leave it in the truck." Agents believe that Michael WILLIAMS agreed to supply "Pete" LNU with a quantity of cocaine. Agents further believe that "Pete" LNU left U.S. currency in payment in a truck for Michael WILLIAMS to pick up.

72. On July 17, 2010, at approximately 4:07 PM, Michael WILLIAMS received a telephone call from the Madden Phone, and spoke to Anthony MADDEN, who told Michael WILLIAMS that he (Anthony MADDEN) needed to see him (Michael WILLIAMS) "one time." Agents believe that Michael WILLIAMS agreed to supply Anthony MADDEN with a quantity of cocaine.

73. Half an hour later, at approximately 4:37 PM, Michael WILLIAMS received a telephone call on Target Telephone #2 from Anthony MADDEN at the same number. Anthony MADDEN told Michael WILLIAMS he had the \$750 that he owed to Michael WILLIAMS. Michael WILLIAMS told Anthony MADDEN that he understood, and would call back in a few minutes. Agents believe that Anthony MADDEN made arrangements to pay Michael WILLIAMS money for drugs he had purchased.

74. On July 31, 2010, at approximately 10:27 AM, Michael WILLIAMS received a telephone call on Target Telephone #2 from the Lomax Phone, and spoke to Ramon LOMAX, a/k/a "Pete". Ramon LOMAX told Michael WILLIAMS that he would "leave two in the tray ... two the hard way." Michael WILLIAMS replied, "Alright." After the telephone call, surveillance agents observed Ramon LOMAX, whom they identified through a photograph on a Massachusetts driver's license in the name of Ramon LOMAX, 16 Warner Street, Dorchester, Massachusetts, exit 16 Warner Street,

walk to a vehicle parked in front of the address, and place something inside. A short while later, agents observed Michael WILLIAMS drive up to the vehicle, park, and enter the same vehicle. I believe that Michael WILLIAMS delivered a quantity of crack cocaine to Ramon LOMAX, and retrieved the payment left by Ramon LOMAX.

75. On August 3, 2010, at approximately 9:35 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Brown Phone, and spoke to Debra BROWN, who told Michael WILLIAMS that she wanted a "softy." Michael WILLIAMS responded, "okay." I believe that Debra BROWN ordered a quantity of cocaine from Michael WILLIAMS.

76. Approximately one hour later at, 10:36 PM, Michael WILLIAMS placed a telephone call over Target Telephone #2 to the Brown Phone and spoke to Debra BROWN. Michael WILLIAMS told Debra BROWN to be "outside in five minutes." I believe that Michael WILLIAMS met Debra BROWN and delivered a quantity of cocaine.

**Cocaine Transaction Between Ryan MORRIS
and Michael WILLIAMS**

77. On August 4, 2010, at approximately 6:45 PM, Michael WILLIAMS placed a telephone call over Target Telephone #2 to the Morris Phone, and spoke to Ryan MORRIS. Michael WILLIAMS told

Ryan MORRIS, "to make it happen tonight man. I can come back around, but it's not gonna be till about nine o'clock." Ryan MORRIS replied, "nah, we do it in the morning, you know me (laughing)." Michael WILLIAMS told Ryan MORRIS, "I definitely want it." Ryan MORRIS replied, "okay, I'm gonna tell him to umm, yo, which one though, 'cause I told you it was two." Michael WILLIAMS replied, "I'll pick the best one man, you know that." Ryan MORRIS replied, "okay, yeah I got you, alright cool, alright I'm, let me call him and let him know. I'll probably just grab it anyway, I just have it though. I believe that when Ryan MORRIS stated, "it was two," he meant two kilograms of cocaine. I further believe that Michael WILLIAMS told Ryan MORRIS that he would purchase "the best one" or the best kilogram of cocaine.

78. On August 5, 2010, at approximately 11:34 AM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Morris Phone and spoke to Ryan MORRIS, who told Michael WILLIAMS that he wanted to meet in forty minutes. At approximately 4:44 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Morris Phone and spoke to Ryan MORRIS, who informed Michael WILLIAMS that he (Ryan MORRIS) was headed to Boston "right now." Michael WILLIAMS asked Ryan MORRIS, "did you check it?" Ryan MORRIS replied in the affirmative. I believe that the "it" Michael WILLIAMS referred to was a quantity of cocaine, and that Michael WILLIAMS wanted to

make sure that Ryan MORRIS checked to make sure the cocaine was of good quality. At approximately 5:55 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Morris Phone and told Ryan MORRIS that he (Michael WILLIAMS) would call as soon as he finished eating. At approximately 6:53 PM, Michael WILLIAMS placed a telephone call over Target Telephone #2 to the Morris Phone and spoke to Ryan MORRIS. The two agreed to meet in "two minutes." I believe that Michael WILLIAMS arranged to meet Ryan MORRIS to obtain at least one kilogram of cocaine from Ryan MORRIS. Later that night, at approximately 9:14 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the Morris Phone and spoke to Ryan MORRIS. Ryan MORRIS told Michael WILLIAMS, "I was just letting you know that I was all great." Michael WILLIAMS replied, "I forgot to call you so I was just calling to let you know I was good, so I heard back at least I know you good." Ryan MORRIS replied, "thanks man. I'm just now getting situated too." Michael WILLIAMS told Ryan MORRIS, "you need a machine." Ryan MORRIS replied, "no doubt." I believe that Ryan MORRIS called Michael WILLIAMS to let Michael WILLIAMS know that he did not get arrested after conducting the kilogram drug deal with Michael WILLIAMS. I further believe that when Ryan MORRIS told Michael WILLIAMS that he was just "getting situated" he meant that he had just finished counting the money that Michael WILLIAMS gave him

in exchange for the kilogram. I believe that the "machine" referred to by Michael WILLIAMS was a money counter.

79. On August 25, 2010, at approximately 4:56 PM, Michael WILLIAMS received a voice mail over Target Telephone #4 from George Leary, who asked Michael WILLIAMS to call back.

80. At approximately 6:15 PM, Michael WILLIAMS used Target Telephone #3 to call the Leary Phone, and asked George LEARY, "What's up?" George LEARY replied, "Two." Michael WILLIAMS said, "I'm coming around the way now. When I get over there, I'll call you." Seconds later, Michael WILLIAMS received a telephone call on Target Telephone #2 from Debra Brown, who ordered, "one." Michael WILLIAMS relied that he had to "go grab some things," then he would see her. I believe that Michael WILLIAMS needed to re-supply his cocaine ("grab some things"), before he could supply George LEARY with "two" and Debra Brown with "one."

81. At approximately 6:20 PM, Michael WILLIAMS used Target Telephone #2 to call Nicole MOORE. During their conversation, Michael WILLIAMS told Nicole MOORE that he needed his small bag. Nicole MOORE agreed to get it for him. Michael WILLIAMS told Nicole MOORE he would "tap the horn" when he got there, and that he should be there in 5-7 minutes, and that she should bring it

to him "real quick." I believe that Nicole MOORE kept a "stash" of cocaine for Michael WILLIAMS, and delivered it (or made it available) when Michael WILLIAMS's cocaine supply ran low.

82. At approximately 6:25 PM, surveillance agents observed Michael WILLIAMS's Silver Lexus drive down Greenwood Street and stop in front of 132 Greenwood Street. I then observed a woman I believe to be Nicole MOORE exit 132 Greenwood Street, and deliver a white bag to Michael WILLIAMS. She then returned to 132 Greenwood Street. I believe that Nicole MOORE, who resides at 132 Greenwood Street, Apartment 3, kept a supply of Michael WILLIAMS's cocaine in her apartment.⁴

83. Following Nicole MOORE'S delivery of the white bag, intercepted conversations showed that Michael WILLIAMS distributed a quantity of what I believe was cocaine to three different customers. I believe he was able to complete those orders because Nicole MOORE replenished his supply from a stash in her apartment at 132 Greenwood Street, Apartment 3.

⁴On November 29, 2010, surveillance agents positively identified Nicole MOORE as the resident of 132 Greenwood Street, Apartment 3, and the user of the Moore Phone (857-251-3209). Surveillance agents observed Nicole MOORE exit 132 Greenwood Street with a small child, whereupon she was compared to her RMV photo and determined to be Nicole MOORE. A surveillance agent placed a call to the Moore Phone and observed her reach for the telephone and answer it. The surveillance agent heard a female voice answer with a child in the background, and then disconnected the call.

F. Interception of Target Telephone #3

84. During the electronic surveillance of Target Telephone #2. Agents learned that Michael WILLIAMS used another cellular telephone to conduct drug business. Agents identified Target Telephone #3 by analyzing pen register data for Target Telephone #2 showing that telephone number 857-212-2778 was subscribed to in the name of Michael WILLIAMS, 136 Greenwood Street, Dorchester, Massachusetts ("Target Telephone #3"). In order to ascertain whether Michael WILLIAMS used Target Telephone #3, agents conducted physical surveillance of Michael WILLIAMS on June 2, 2010. At approximately 4:55 PM, agents were in the area of 136 Greenwood Street viewing video images from the pole camera located outside 136 Greenwood Street. At that time, agents observed Michael WILLIAMS on the back deck of 136 Greenwood Street. An agent placed a telephone call from a DEA-issued cellular telephone, with a blocked caller identification number, to Target Telephone #3. As the phone call connected, agents observed Michael WILLIAMS take out a cellular telephone in his possession, look at it, and put it down. Based on intercepted conversations over Target Telephone #1 and Target Telephone #2, agents knew that Michael WILLIAMS would not answer a telephone call from a blocked or restricted number. In fact, Michael WILLIAMS' voice mail message on Target Telephone #2 specifically states that he (Michael WILLIAMS) will not answer a call coming

from a blocked or restricted number.

85. Based on the above-described observations, as well as information learned from an examination of telephone toll records for Target Telephone #3, agents applied for and were granted court authorization to intercept wire communications over Target Telephone #3.

86. On June 23, 2010, July 22, 2010, August 20, 2010, and September 17, 2010, Task Force Officer Paul M. Gallagher filed Affidavits in support of Applications by Assistant U.S. Attorney Heidi E. Brieger in support of Orders Authorizing Interception of Wire Communications Over Target Telephone #3.

87. Based on intercepted conversations, agents learned that Michael WILLIAMS used Target Telephone #3 to contact at least two sources of supply for cocaine and crack cocaine, as well as to conduct drug transactions with numerous customers.

88. For example, on June 25, 2010, at approximately 7:34 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from 617-980-9097, subscribed to in the name of Frank Copeland, with no known address (the "Copeland Phone"), and spoke to a male, later identified following a traffic stop as Frank COPELAND (a/k/a "Brito.")

Michael WILLIAMS: What's up, Brito?

COPELAND: What's up? (unintelligible) Hey I was wondering, you switched up on me huh?

Michael WILLIAMS: That's the same one ... (unintelligible).

COPELAND: From three days ago?

Michael WILLIAMS: Yup.

COPELAND: From last week too?

Michael WILLIAMS: I can't hear you.

COPELAND: From last week.

Michael WILLIAMS: No, not last week, but from three days.

COPELAND: Yeah, 'cause it's different man. It ain't, it ain't the same man.

Michael WILLIAMS: What's the deal? What's the difference with it?

COPELAND: I don't know. It ain't doin' up right. It's, it's, you know. And today, I done it all, all the way down to the gristle and it still got a couple of complaints.

Michael WILLIAMS: It's what?

COPELAND: I done it all the way, way down today.

Michael WILLIAMS: Yeah.

COPELAND: And I still got a couple of complaints.

Michael WILLIAMS: Oh, really? I don't know man. I don't know, that's the only one I got left at this moment though.

COPELAND: Alright, I was just saying you know ... (unintelligible).

Michael WILLIAMS: (unintelligible) ... for the last three days, that's what you been havin'.

COPELAND: Yeah, but see I, see I, I missed some people but I really don't. You know what I'm saying?

Michael WILLIAMS: Right.

COPELAND: So today, he just came back again, so I said well ... (unintelligible).

Michael WILLIAMS: But I'm saying ... (unintelligible) ... does it hold and do whatever else it's supposed to....

COPELAND: No, not really, no.

Michael WILLIAMS: Oh, okay.

COPELAND: No one else said nothin'?

Michael WILLIAMS: No, not to me at all. Nope.

COPELAND: Oh. ... (unintelligible) ... alright, I mean, like, you don't lose.

Michael WILLIAMS: Huh?

COPELAND: You don't lose.

Michael WILLIAMS: Right.

COPELAND: You know what I'm saying.

Michael WILLIAMS: I get the strength, though. You know what I'm saying. I, I don't know. You know how you get used to one thing and then it switches up, you know.

COPELAND: Yeah, yeah.

Michael WILLIAMS: Alright, as long as you didn't lose, I'm good, I'm glad ... you know.

COPELAND: Alright.

Michael WILLIAMS: Alright, alright baby.

I believe that Frank COPELAND's customers complained that the quality of crack cocaine he received from Michael WILLIAMS was poor.

89. On June 26, 2010, at approximately 5:14 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from the Walker Phone, and spoke to a male, whom agents identified as Shawn WALKER. Shawn WALKER asked Michael WILLIAMS for "an old school and a one-time." Michael WILLIAMS told Shawn WALKER that he would meet him at "your spot." At approximately 5:54 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to the Walker Phone and spoke to Shawn WALKER. Shawn WALKER told Michael WILLIAMS that he was, "calling to change that." He said he "was going to get a, um, you know, that big boy ... that new school." Michael WILLIAMS replied, "okay ... fourteen ten." At approximately 6:05 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to the Walker Phone and spoke to Shawn WALKER. Michael WILLIAMS told Shawn WALKER that he was "about to swing the corner." I believe that the reference to "old school" means powder cocaine, and that the reference to "one-time" means 62 grams. I believe that "new school" referred to crack cocaine,

and the reference to "big boy" meant 62 grams, based on the price of \$2,400. I believe that Michael WILLIAMS delivered sixty-two grams of crack cocaine to Shawn WALKER.

90. At approximately 6:04 PM, surveillance agents located in the area of Shawn Walker's residence at 82 Centre Street, Dorchester, watched an individual leave the residence located at 82 Centre Street, Dorchester, and meet with Michael WILLIAMS who was parked in front of that location. The individual got into the passenger side of Michael WILLIAMS's Jeep and exited less than one minute later with an object grasped in his hand and returned to the residence located at 82 Centre Street, Dorchester. Based in part on these surveillance observations, this individual was identified as Shawn WALKER by comparing a Registry of Motor Vehicles photograph of Shawn WALKER, 82 Centre Street, Dorchester to the individual who met with Michael WILLIAMS.

Michael WILLIAMS Negotiated Cocaine Transaction with Dwayne PERSON

91. On June 28, 2010, at approximately 8:44 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to 617-212-7559, subscribed to in the name of Beverly Person, 8 Peacevale Road, Dorchester, Massachusetts ("Target Telephone #4"), and spoke to a male later identified as Dwayne PERSON, of 8

Peacevale Road, Dorchester, Massachusetts. Michael WILLIAMS asked Dwayne PERSON what time he would be around on the following day, June 29, 2010. Michael WILLIAMS and Dwayne PERSON agreed to meet the following day, June 29, 2010 at 10 AM.

92. On June 29, 2010, at approximately 11:38 AM, Michael WILLIAMS called Dwayne PERSON on Target Telephone #4, over Target Telephone #3:

Dwayne PERSON: Yeah Biggie.

Michael WILLIAMS: Yo, what's up my G? You around?

Dwayne PERSON: Um, yeah I'm getting ready to get off the highway right now.

Michael WILLIAMS: How long you think?

Dwayne PERSON: Um, maybe like about fifteen, fifteen, twenty minutes.

Michael WILLIAMS: Alright.

93. At approximately 12:31 PM, Michael WILLIAMS called Dwayne PERSON on Target Telephone #4, who told Michael WILLIAMS that he was, "at the crib, just come check 'em."

94. Surveillance agents observed Michael WILLIAMS on the

porch outside of 8 Peacevale Road, Dorchester, Massachusetts at approximately 12:55 PM, and further observed Michael WILLIAMS leave with what I believe was one kilogram of cocaine stuffed into a manilla envelope, stuffed rear right oversized pocket. I believe that "sneakers" was code for U.S. currency, and that Michael WILLIAMS gave Dwayne PERSON money for a quantity of cocaine.

95. At approximately 1:21 PM, Michael WILLIAMS, using Target Telephone #3, called Dwayne PERSON on Target Telephone #4, and spoke to Dwayne PERSON:

Dwayne PERSON: Yeah B?

Michael WILLIAMS: You, you still there?

Dwayne PERSON: Yeah.

Michael WILLIAMS: Yo, I'm coming down from the, from, from the school way.

Dwayne PERSON: Okay.

Michael WILLIAMS: Be out there, so I can give you your box of sneakers I got for you.

Dwayne PERSON: Okay.

Michael WILLIAMS: Alright.

96. On June 29, 2010, Michael WILLIAMS returned a phone call to Shawn Walker on the Walker Phone. Shawn WALKER told Michael WILLIAMS that he wanted "grab that big boy from you real quick." Michael WILLIAMS responded, "Fourteen (14) cents." Based on intercepted calls, Agents know that a "big boy" is 62 grams of cocaine. Agents know also that "fourteen cents" means \$1,400. Michael WILLIAMS told Shawn WALKER that he would be there in five minutes.

97. On July 1, 2010, Shawn WALKER called Michael WILLIAMS, and told him that he needed a "big boy and a one time." Michael WILLIAMS responded, "OK, big boy. OK. I got you. Are you over there?" Shawn WALKER said he was "right here at the crib." Michael WILLIAMS said, I'll be there in three minutes. Michael WILLIAMS said, "get it together and come outside, 'cause I be right there."

Arrest of Frank COPELAND

98. On July 2, 2010, at approximately 3:45 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from the Copeland Phone, and made arrangements with Frank COPELAND to conduct a drug transaction. At approximately 4:01 PM, Michael WILLIAMS received another telephone call on Target Telephone #3

from Frank COPELAND, who told Michael WILLIAMS that he was at the pre-arranged meeting location.

99. Agents established surveillance at the corner of Talbot Avenue and Westcott Street in Dorchester, where from previous surveillance, agents had learned that the two usually met. At approximately 4:15 PM, Michael WILLIAMS and Frank COPELAND were observed meeting. Agents observed Frank COPELAND lean into the passenger's side window of Michael WILLIAMS' vehicle for one minute. After Frank COPELAND left the vehicle agents observed an object in his hand. When Frank COPELAND departed from the corner in his black Mercedes, Massachusetts Registration Number 41FA86, registered in the name of Frank L. Copeland, 24 Mark Drive, Milford, Massachusetts, BPD officers stopped Frank COPELAND for a traffic violation, during the course of which, officers seized sixty-two grams of suspected cocaine from Frank COPELAND'S waistband. During the stop, Frank COPELAND identified himself, was read his Miranda warnings and gave officers a Massachusetts drivers license in the name of Frank COPELAND, 24 Mark Drive, Milford, Massachusetts. At that time, Frank COPELAND stated, "this is more than about a traffic stop." He made no further comments.

The substance seized from Frank COPELAND was analyzed and determined to be 62 grams of 73% pure cocaine hydrochloride.

Frank COPELAND was arrested and is out on bail facing cocaine trafficking charges in Suffolk County.

100. Later that evening, at approximately 5:40 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from telephone number 617-803-6752, with unknown subscriber information, and spoke to an unidentified male ("UM6752"). UM6752 identified himself as "Frank's nephew," who told Michael WILLIAMS, "Frank got locked up." Michael WILLIAMS hung up Target Telephone #3.

101. A minute later, at approximately 5:41, Michael WILLIAMS placed a telephone call over Target Telephone #3 to telephone number 617-803-6752, and spoke again to UM6752. Michael WILLIAMS asked UM6725 what happened. UM6752 replied, "Frank is at B-3 and was arrested thirty minutes ago." Michael WILLIAMS told UM6752 to keep him posted. I know that "B-3" refers to the police station where officers transported Frank COPELAND following his arrest. I further believe that UM6752 called Michael WILLIAMS to warn him about Frank COPELAND's arrest.

102. On July 5, 2010, at approximately 5:36 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to the Copeland Phone and spoke to Frank COPELAND. Michael WILLIAMS asked Frank COPELAND what happened the other night. Frank

COPELAND replied, "I got caught up." Michael WILLIAMS agreed to call Frank COPELAND when he was in the area. At approximately 6:12 PM, Michael WILLIAMS placed a telephone call over Target Telephone #3 to the Copeland Phone and told Frank COPELAND to meet him at "the spot" in twenty minutes to discuss Frank COPELAND's arrest.

Michael WILLIAMS Bought Cocaine From Dwayne PERSON

103. On July 5, 2010, at approximately 5:18 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to Target Telephone #4, and spoke to Dwayne PERSON. Michael WILLIAMS told Dwayne PERSON that he was waiting. Dwayne PERSON reminded Michael WILLIAMS that he had said that he would call tomorrow (July 6, 2010). I believe that Michael WILLIAMS contacted one of his sources of supply, Dwayne PERSON, to obtain more cocaine.

104. On July 6, 2010, at approximately 1:13 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from one of his frequent customers on 617-980-2164, with unknown subscriber information, and spoke to an unidentified male (FNU LNU (a/k/a "P")). "P" asked Michael WILLIAMS, "how we looking?" Michael WILLIAMS replied, "I'm still waiting for this cat to call me right now." Michael WILLIAMS then said, "I don't have, I didn't have totally, I didn't have totally what you had wanted,

so that's why I didn't call you." I believe that Michael WILLIAMS was out of cocaine, and referred to the fact that he was waiting for his source of supply to call so that he could replenish his cocaine supply.

105. Shortly afterwards, at approximately 2:59 PM, Michael WILLIAMS, using Target Telephone #3, had a conversation with Dwayne PERSON on Target Telephone #4. Due to an equipment malfunction, the first half of the conversation was not recorded, however, during the second half of the conversation, Dwayne PERSON told Michael WILLIAMS that he was ready for him. Michael WILLIAMS told Dwayne PERSON that he would call him later.

106. On July 6, 2010, agents established surveillance at Dwayne PERSON's residence at 8 Peacevale Road, Dorchester, Massachusetts. At approximately 3:41 PM, agents observed Michael WILLIAMS arrive at 8 Peacevale Road. Agents observed him enter the residence, and depart at approximately 3:47 PM, carrying a sagging black duffle bag. Michael WILLIAMS put the duffel bag in his grey Lexus, and departed from the area. Agents followed Michael WILLIAMS back to his residence at 10 Coffey Street, Dorchester, Massachusetts.

107. On July 6, 2010, at approximately 10:01 PM, Michael WILLIAMS received a telephone call over Target Telephone #3 from

(617)980-2164, with no known subscriber information, and spoke to FNU LNU (a/k/a "P"). "P" told Michael WILLIAMS that he would meet him at the spot on "Seaver" in ten minutes. Michael WILLIAMS told "P" that he would meet him there and that he would be in his car. I believe that Michael WILLIAMS delivered to "P" a quantity of drugs that Michael WILLIAMS had just received from Dwayne PERSON.

108. On July 12, 2010, at approximately 9:42 PM, Michael WILLIAMS received a telephone call over Target Telephone #3 from Target Telephone #4 and spoke to Dwayne PERSON. Michael WILLIAMS asked Dwayne PERSON, "what's up with that thing?" Dwayne PERSON replied, "what thing?" Michael WILLIAMS told him, "the thing, you know I ain't gonna say." Michael WILLIAMS agreed to meet up with Dwayne PERSON in five or ten minutes. At approximately 9:56 PM, Michael WILLIAMS placed a telephone call over Target Telephone #3 to Target Telephone #4 and told Dwayne PERSON, "Hi, this is me." Although there was no physical surveillance of the meeting, I believe that Michael WILLIAMS obtained a quantity of cocaine from Dwayne PERSON.

109. On July 13, 2010, at approximately 4:11 PM, Michael WILLIAMS placed a telephone call over Target Telephone #3 to Target Telephone #4 and spoke to Dwayne PERSON. Dwayne PERSON asked Michael WILLIAMS if he could meet up with him. Michael

WILLIAMS told Dwayne PERSON he was busy at the moment, but could meet him at six o'clock. At approximately 6:08 PM, Michael WILLIAMS placed a telephone call over Target Telephone #3 to the Person Phone and spoke to Dwayne PERSON. Dwayne PERSON told Michael WILLIAMS that he was right around the corner on "Talbot," but he would head over to Michael WILLIAMS' location. I believe that Michael WILLIAMS and Dwayne PERSON met to conduct drug business.

110. On July 22, 2010, at approximately 8:31 PM, Dwayne PERSON, called Michael WILLIAMS on Target Telephone #3:

Dwayne PERSON: What's up Biggin'?

Michael WILLIAMS: Hello?

Dwayne PERSON: Yeah, what's up Mike?

Michael WILLIAMS: Yeah, did we ever get right on that other thing, so I can do a switch out?

Dwayne PERSON: Naw, ... I was waiting 'cuz I got the um, I think, I got some, right.

Michael WILLIAMS: Yeah.

Dwayne PERSON: But it ain't the way you, you like it.

Michael WILLIAMS: Yeah, Know. I, I hear ya.

Dwayne PERSON: Cuz, I'll let you check it when I come back in tomorrow.

Michael WILLIAMS: No, I'm gonna wait. You don't know when?

Dwayne PERSON: Yeah, I was waiting for a phone call. That's what I'm doin'.

Michael WILLIAMS: Alright, well, I can wait. I can wait a couple of more days.

Dwayne PERSON: You like that one?

Michael WILLIAMS: Yeah, the one I had got? Yeah, it was fine.

Dwayne PERSON: Alright, well next time call me earlier Big. I want you to be like, yo.

Michael WILLIAMS: Well, I mean, well your remember you told me, when you got it in hand, you was going to do a switch.

Dwayne PERSON: Right.

Michael WILLIAMS: So that's why I waited for you to call.

Dwayne PERSON: Yeah, I know I didn't, cuz I know what you like.

So, I been waitin' for that. You know what I'm saying?

Michael WILLIAMS: Alright. Well, just, yeah. I'll wait for that.

111. Based on my training and experience and participation in this investigation, I believe that Michael WILLIAMS had been unhappy with the quality of cocaine that Dwayne PERSON had previously delivered to him. Michael WILLIAMS had wanted to "do a switch out," meaning he wanted to get better quality cocaine in exchange for the low quality product that Dwayne PERSON said "ain't the way you like it."

112. On July 23, 2010, at approximately 3:41 PM, monitors intercepted a call over Target Telephone #3 to telephone number 617-943-8461, with no available subscriber information, during which Michael WILLIAMS spoke to an unidentified male (UM8461) a/k/a "Tony," who said to Michael WILLIAMS: "Yo". Michael WILLIAMS responded, "Hey, Tony, I'm in the middle of putting everything together, right now. "Tony" said, "Okay. Cool." Michael WILLIAMS told "Tony" that "as soon as I get, so soon as I get done, I'll be, I'll be to see you." "Tony" responded, "Okay, good enough man. Give me a call. I'll be waiting for ya, man." Based on my training and experience and participation in this investigation, I believe that "Tony" ordered cocaine from Michael

WILLIAMS, who agreed to deliver it as soon as he was finished "putting everything together," which I believe meant packaging the cocaine.

113. On August 6, 2010, Shawn Walker called Michael WILLIAMS and told him that he wanted a "14", which agents know is half an ounce of cocaine. Michael WILLIAMS responded, "When?" Shawn Walker said, "right now." Michael WILLIAMS said, "OK, 14 cents. I'm going to be coming down from the top. I'll be there in about five minutes." Based on the investigation, agents know that "the top" refers to Talbot Avenue at Centre Street, which is moments from Shawn WALKER's residence at 82 Centre Street, Dorchester, Massachusetts.

**Michael WILLIAMS Employed Nicole MOORE To
Maintain Stash of Cocaine**

114. During the course of the investigation, monitors intercepted numerous calls between Michael WILLIAMS and Nicole MOORE in which Michael WILLIAMS instructed her to meet him at specific times with specific items. The pattern of these intercepted calls showed that Nicole MOORE kept cocaine for Michael WILLIAMS in her apartment (#3) at 132 Greenwood Street. For example, On August 3, 2010, at approximately 7:23 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE during which Michael WILLIAMS told her to "come downstairs"

because I want to "keep it moving." On August 23, 2010, at approximately 4:56 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE during which he asked her to bring him the "bag with the little pieces of rock candy" and to bring it "real quick." On August 23, 2010, at approximately 7:17 PM, monitors intercepted another call from Michael WILLIAMS to Nicole MOORE during which he asked her if she had "put everything away." On August 25, 2010, at approximately 6:20 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE during which he told her that he needed "his small bag." On September 2, 2010, at approximately 10:09 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE in which he told her that he needed "two times." On September 8, 2010, at approximately 4:23 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE in which he said he was "hungry," and wanted to know where the food was. Nicole MOORE responded, "In the closet." On September 9, 2010, at approximately 10:09 PM, monitors intercepted a call from Nicole MOORE to Michael WILLIAMS during which she told him that she was "on the porch." Michael WILLIAMS told her to "bring him one." On September 16, 2010, at approximately 4:18 PM, monitors intercepted a call from Michael WILLIAMS to Nicole MOORE during which he told her to bring him "the whole sandwich out of that bag," and to hurry because he was outside waiting for her.

115. On August 14, 2010, at approximately 3:28 PM, monitors intercepted a call from George LEARY, who used telephone number 617-506-1171, subscribed to in the name of George LEARY, 355 Massachusetts Avenue, Boston, Massachusetts (the "Leary Phone"), and spoke with a male whom monitors have identified as George LEARY. George LEARY ordered "two" from Michael WILLIAMS, who told George LEARY that he was "putting everything together." At the time of that conversation, agents learned from the Sprint GPS location information for Target Telephone #3, that Michael WILLIAMS was physically located on Greenwood Street in Dorchester. At approximately 5:52 PM, monitors intercepted a second call from George LEARY to Michael WILLIAMS on Target Telephone #3, during which Michael WILLIAMS said, "I'm still putting it together. George LEARY responded, "Just checking on the chef." Michael WILLIAMS said, "the chef's doing good." At the same time as these telephone calls, agents observed on the pole camera that four out five of Michael WILLIAMS' vehicles were parked in the driveway for 136 Greenwood Street. In addition, at approximately 6:43 PM, surveillance agents observed (on the pole camera) Michael WILLIAMS exit the back door of 136 Greenwood Street, walking down from an upper level, carrying a dark-colored duffel bag on his shoulder. Michael WILLIAMS then placed the bag into his silver Lexus. Based on my training and experience and participation in this investigation, I believe that Michael

WILLIAMS was at 136 Greenwood Street, cooking crack cocaine ("putting it together") when he spoke to George LEARY. I believe that when George LEARY "checked on the chef," LEARY referred to Michael WILLIAMS cooking the crack cocaine.

116. On August 26, 2010, at approximately 3:33 PM, Michael WILLIAMS received a telephone call over Target Telephone #2 from the LOMAX Phone, and spoke to Ramon LOMAX:

Michael WILLIAMS: Hey, are you home?

"Pete": What's going on, sir?

Michael WILLIAMS: Are you home?

"Pete": Yeah.

Michael WILLIAMS: OK, what's the number?

"Pete": Three and one.

Michael WILLIAMS: Alright. I'll get you.

"Pete": I'm sorry. Two and one.

Michael WILLIAMS: OK. I'll call you when I'm pulling up.

117. On August 27, 2010, at approximately 6:30 PM, Michael WILLIAMS called the Madden Phone, and spoke to Anthony MADDEN:

Anthony MADDEN: Hello.

Michael WILLIAMS: Hey what's up man?

Anthony MADDEN: Hey. What's happening?

Michael WILLIAMS: You.

Anthony MADDEN: Yeah. Um. Yeah. I, I waiting on them to get back but I still got someone here. Um, I need one right now, for now.

Michael WILLIAMS: Ok, go there right now.

Anthony MADDEN: Huh?

Michael WILLIAMS: Go there right now.

Anthony MADDEN: I'm going there right now.

Dwayne PERSON Sold Cocaine To Michael WILLIAMS

118. On August 30, 2010, at approximately 9:40 AM, Michael WILLIAMS received a page over Target Telephone #3 from Target Telephone #4. I believe that Dwayne PERSON paged Michael WILLIAMS to make arrangements for a re-supply of cocaine.

119. At approximately 1:12 PM, Michael WILLIAMS called Dwayne PERSON on Target Telephone #4, and had the following conversation:

Dwayne PERSON: What's up my G?

Michael WILLIAMS: Hey, what's going on? What, what's good?

Dwayne PERSON: Hey, you OK?

Michael WILLIAMS: Um, I could use one.

Dwayne PERSON: OK, 'cuz dem people came back up. So ...

Michael WILLIAMS: You got the ones I like?

Dwayne PERSON: Yup.

Michael WILLIAMS: Alright. When you, you ...

Dwayne PERSON: I'll call you.

Michael WILLIAMS: Alright.

120. Based on my training and experience and participation in this investigation, I believe that Dwayne PERSON told Michael WILLIAMS that he had a supply of cocaine that Michael WILLIAMS had already purchased and liked, and that Dwayne PERSON agreed to supply Michael WILLIAMS. At approximately 2:52 PM, Michael WILLIAMS called Dwayne PERSON again on Target Telephone #4 and had the following conversation:

Dwayne PERSON: Yeah, my G.

Michael WILLIAMS: What's good?

Dwayne PERSON: What's good?

Michael WILLIAMS: You!

Dwayne PERSON: You ready? Whenever you ready.

Michael WILLIAMS: Alright, I'll call you. I'll call you after six, 'cuz I, I won't be around 'till after that.

Dwayne PERSON: OK.

121. Based on my training and experience and participation in this investigation, I believe that Dwayne PERSON and Michael WILLIAMS continued to plan to meet so that Dwayne PERSON could supply Michael WILLIAMS with cocaine as soon as Dwayne PERSON was ready.

122. At approximately 7:48 PM, Dwayne PERSON called Michael WILLIAMS on Target Telephone #3 and had the following conversation:

Michael WILLIAMS: What's up my G?

Dwayne PERSON: What's up Mike?

Michael WILLIAMS: You man. Tell you what. I'll get with you.

I'll get with you in the morning, soon as I get from the gym.

Dwayne PERSON: OK.

Michael WILLIAMS: How you doing bro?

Dwayne PERSON: Alright man.

Michael WILLIAMS: Alright good. ... Alright, I got you. Make sure.

Based on my training and experience, and participation in this investigation, I believe that Michael WILLIAMS and Dwayne PERSON rescheduled their meeting for the morning.

123. The following afternoon, on August 31, 2010, at approximately 1:01 PM, Michael WILLIAMS placed a telephone call to Dwayne PERSON on Target Telephone #4 to arrange the meeting they had discussed the previous night. They had the following conversation:

Dwayne PERSON: Yeah, Cutty.

Michael WILLIAMS: What's up old man?

Dwayne PERSON: I'm here.

Michael WILLIAMS: Ok, I'll be through there in about fifteen minutes.

Dwayne PERSON: Alright.

124. Based on my training and experience and participation in this investigation, I believe that Michael WILLIAMS told

Dwayne PERSON that he would arrive at Dwayne PERSON's residence shortly for the planned cocaine transaction. In addition, surveillance agents using cell site location information, located Michael WILLIAMS' Dodge pickup truck, bearing Massachusetts registration 3LS410, registered in the name of Michael WILLIAMS, parked outside of 108 Sumner Street, Quincy, Massachusetts, where surveillance Michael WILLIAMS's girlfriend Nicole Willis resides, and where agents have frequently observed that Michael WILLIAMS uses as an alternate residence.

125. Law enforcement agents conducted surveillance of the meeting between Michael WILLIAMS and Dwayne PERSON at 8 Peacevale Road, Dorchester, Massachusetts. At approximately 1:38 PM, surveillance agents observed Michael WILLIAMS arrive at 8 Peacevale Road, Dorchester in his silver Lexus, bearing Massachusetts registration M53000, registered in his name, 132 Greenwood, LLC (the "Silver Lexus"). Michael WILLIAMS pulled the Silver Lexus into the driveway of 8 Peacevale Road and entered the residence. At approximately 1:44 PM, surveillance agents observed Michael WILLIAMS and Dwayne PERSON emerge from 8 Peacevale Road, and head toward the Silver Lexus. Dwayne PERSON carried a brown cloth bag, which he deposited onto the front passenger's seat of the Silver Lexus. Michael WILLIAMS entered the Silver Lexus and drove away.

126. On September 9, 2010, Dwayne PERSON called Noel WILLIAMS at telephone number 617-938-1720, subscribed to in the name of Noel WILLIAMS, 12 Nottingham Street, Dorchester, Massachusetts (the "Williams Phone"). Dwayne PERSON asked whether he could "borrow a car" from Noel WILLIAMS. Agents know from the investigation that a "car" is a kilogram of cocaine. Noel WILLIAMS said "Yup." Dwayne PERSON said that he was "trying to make some rent money," and he would "give it back to you." Noel WILLIAMS said, "come by, come by, come by." Surveillance agents followed Dwayne PERSON from 8 Peacevale Road in the Green Minivan to 12 Nottingham Street, where they observed Dwayne PERSON meet Noel WILLIAMS on the front porch of 12 Nottingham Street. Based on a comparison between the RMV license photo for Noel WILLIAMS, 12 Nottingham Street, Apartment 12A, agents positively identified the male meeting on the porch with Dwayne PERSON as Noel WILLIAMS. Agents believe based on this intercepted calls, as well as others, that Noel WILLIAMS is a partner/alternate source of supply for Dwayne PERSON's in the cocaine business.

127. On September 19, 2010, surveillance agents observed Kervin PENA at Dwayne PERSON's residence at 8 Peacevale Road at approximately 3:00 PM. Based on intercepted conversations, Kervin PENA had arranged to sell Dwayne PERSON a kilogram of cocaine. At approximately 3:49 PM, monitors intercepted a call

from Dwayne PERSON to Noel WILLIAMS on the Williams Phone.

Dwayne PERSON said, "how much you got over there?" Noel WILLIAMS responded, "I've got 18." Dwayne PERSON then said, "I'll be right over." Surveillance agents observed at approximately 3:58 PM, Dwayne PERSON left 8 Peacevale Road. At approximately 4:16 PM, Dwayne PERSON returned home. At approximately 4:32 PM, Kervin PENA emerged from 8 Peacevale Road carrying a bag. Agents believe that Noel WILLIAMS (Dwayne PERSON's partner) provided partial payment for the kilogram purchase from Kervin PENA.

128. On September 22, 2010, at approximately 5:22 PM, Michael WILLIAMS placed a telephone call on Target Telephone #3 to Target Telephone #4, and spoke to Dwayne PERSON:

Dwayne PERSON: "Yeah Cuddy?"

Michael WILLIAMS: "I didn't forget about you."

Dwayne PERSON: "Okay."

Michael WILLIAMS: "I'm still just running around baby, its one of those days I had to do more shit than I expected to."

Dwayne PERSON: "Okay (unintelligible)."

Michael WILLIAMS: "Okay so, don't, don't forget about me man, I got you."

Dwayne PERSON: "Alright."

I believe that Michael WILLIAMS told Dwayne PERSON that he was ready to be re-supplied with a quantity of cocaine.

129. On September 23, 2010, at approximately 5:21 PM, Michael WILLIAMS received a telephone call over Target Telephone #3, from Target Telephone #4, and spoke to Dwayne PERSON, who told Michael WILLIAMS that he was with his family, but wanted to meet up with Michael WILLIAMS the following afternoon (September 24, 2010). Michael WILLIAMS replied, "okay, well let me know because you know I ... know what I mean?" Dwayne PERSON asked Michael WILLIAMS to "grab it and hold it for me, I got you tomorrow." I believe that Michael WILLIAMS and Dwayne PERSON arranged a cocaine transaction for the following afternoon.

130. On September 25, 2010, at approximately, 5:48 PM, Michael WILLIAMS received a telephone call on Target Telephone #3 from Target Telephone #4 and spoke to Dwayne PERSON.

Michael WILLIAMS: "What's up old man?"

Dwayne PERSON: "Yeah, you called him?"

Michael WILLIAMS: "I called you like five times now (unintelligible)."

Dwayne PERSON: "Yeah, I didn't know what phone, I didn't even hear the phone."

Michael WILLIAMS: "I didn't want to stop unless I heard from you, you know what I'm saying."

Dwayne PERSON: "Oh yeah, I'm all, you all set?"

Michael WILLIAMS: "Oh, okay, I'll umm, I'll come back through there man, I'm at McDonald's on the Legion eating, again (laughs)."

Dwayne PERSON: "Okay (unintelligible)."

Michael WILLIAMS: "Soon as I get done man, I'll head down to you."

Dwayne PERSON: "Alright."

Michael WILLIAMS: "Alright."

I believe that Michael WILLIAMS and Dwayne PERSON met to conduct a drug transaction, though surveillance agents were unable to confirm the interaction.

G. Interception of Target Telephone #4

131. On August 6, 2010, September 3, 2010, October 1, 2010,

and October 29, 2010, Task Force Officer Paul M. Gallagher filed Affidavits in support of Applications by Assistant U.S. Attorney Heidi E. Brieger in support of Orders Authorizing Interception of Wire Communications Over (617) 212-7559 ("Target Telephone #4"). The Court authorized interception of wire communications over Target Telephone #4, a cellular telephone used by Dwayne PERSON, and subscribed to in the name of Beverly Person, 8 Peacevale Road, Dorchester, Massachusetts.

Ryan MORRIS Sold Cocaine To Dwayne PERSON

132. August 9, 2010, at approximately 10:32 AM, Dwayne PERSON received a telephone call over Target Telephone #4 from 857-204-9484, with unknown subscriber information, and spoke to an unidentified male ("UM9484"). UM9484 told Dwayne PERSON that UM9684 thought he was going to "make a couple moves," but that he was not able to. Dwayne PERSON replied, "no, it should be today (unintelligible), I hope today, soon as I get it in my hand I give you a holler." Agents believe that when UM9484 used the term "make a couple moves," he meant selling drugs. Agents further believe that Dwayne PERSON told UM9484 that he hoped to obtain more drugs that day and would be able to supply UM9484 with them.

133. Later that afternoon, at approximately 1:53 PM, Dwayne

PERSON received a telephone call over Target Telephone #4 from 617-602-7925, subscribed to in the name of William Cabral, 7 Buckley Avenue, Boston, Massachusetts, (the "Nouel Phone"), used by Miguel Angel NOUEL of 302 Centre Street, Apartment #1, Jamaica Plain, Massachusetts, who is based on the investigation, believed to be one of Dwayne PERSON's sources of cocaine supply. Miguel Angel NOUEL told Dwayne PERSON, "I'm out here guy." I believe that during that call, Miguel Angel NOUEL told Dwayne PERSON that he was "out here" meaning out looking for cocaine supply for Dwayne PERSON.

134. At approximately 3:29 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the Morris Phone and asked Ryan MORRIS, "can you put something together for me?" Ryan MORRIS replied, "yeah, whatever, it don't matter, but I, um, gonna make sure dude get the other one and then I just (unintelligible) give them everything you know?" They agreed to speak later. I believe that the phrase "put something together," referred to a requested re-supply of cocaine. I further believe that Ryan MORRIS is a source of cocaine supply for Dwayne PERSON.

135. At approximately 9:34 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the MORRIS Phone and spoke to Ryan MORRIS. Ryan MORRIS asked Dwayne PERSON if they could do "that thing" in the morning. Dwayne PERSON agreed and

told Ryan MORRIS, "if your boy don't get it, I'll take it." I believe that Dwayne PERSON and Ryan MORRIS planned to conduct a drug transaction in the morning.

136. On August 10, 2010, at approximately 12:53 PM, Dwayne PERSON received a telephone call on Target Telephone #4 from the Nouel Phone and spoke to Miguel Angel NOUEL who told Dwayne PERSON, "let me, let me make that call, I'm gonna call you back okay?" Dwayne PERSON answered in the affirmative. I believe that Miguel Angel NOUEL told Dwayne PERSON he would call to check on a new supply of drugs.

137. At approximately 3:38 PM, Dwayne PERSON received a telephone call over Target Telephone #4 from the Nouel Phone and spoke to Miguel Angel NOUEL who said, "they just called me, um, to see if I go tomorrow. They gonna call me back later, so I'm gonna call you to make sure." Dwayne PERSON replied, "yeah, you gotta make sure, if they not, I'm just head on, you know what I mean?" Miguel Angel NOUEL told Dwayne PERSON, yeah, I gonna give you a holla, then you come over (unintelligible). I believe that Miguel Angel NOUEL told Dwayne PERSON he could re-supply Dwayne PERSON with drugs the following day.

138. On August 11, 2010, at approximately 12:59 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the

Nouel Phone and left a message asking for a return phone call. Before he hung up, Dwayne PERSON marked the message as "urgent."

139. At approximately 1:01 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to 617-799-2845, with unknown subscriber information, but which is used by Ryan MORRIS (the "Second MORRIS Phone"). Dwayne PERSON spoke with Ryan MORRIS who told Dwayne PERSON that he was going to pick "it" up in approximately an hour and would call Dwayne PERSON afterwards. I believe that Dwayne PERSON had called the Second MORRIS Phone because electronic surveillance of Target Telephone #4 showed that Dwayne PERSON made several attempts (at 2:05 PM on August 10, 2010, and 12:25 PM, and 1:00 PM, on August 11, 2010) to reach Ryan MORRIS without success. I further believe that Dwayne PERSON'S frequent telephone calls to both MORRIS Phones were his continuing effort to obtain cocaine. Later that evening, at approximately 7:40 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the Nouel Phone and spoke to Miguel Angel NOUEL. Dwayne PERSON told Miguel Angel NOUEL that people had been "blowing up" his telephone. Miguel Angel NOUEL told Dwayne PERSON, "when you out of it you [know] how it is," and that people called him "like crazy." Dwayne PERSON replied, "got to take the bitter with the sweet and the sweet with the bitter." I believe that Miguel Angel NOUEL and Dwayne PERSON discussed drug customers who called them looking for a quantity of drugs.

140. At approximately 10:45 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the MORRIS Phone. This call went unanswered. Seconds later, Dwayne PERSON placed a telephone call over Target Telephone #4 to the Second MORRIS Phone. This call also went unanswered. I believe that Dwayne PERSON had attempted to contact Ryan MORRIS to conduct the drug transaction they had spoken of earlier in the day. I further believe that Ryan MORRIS's apparent refusal to answer both of the MORRIS Phones indicate that Ryan MORRIS was unwilling to conduct a drug transaction with Dwayne PERSON.

141. On August 12, 2010, at approximately, 7:32 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the Nouel Phone and spoke to Miguel Angel NOUEL. Miguel Angel NOUEL told Dwayne PERSON that he had called repeatedly, but was unable to get through. Dwayne PERSON told Miguel Angel NOUEL that his "phone's blowing up," and that he has "gotta eat." Miguel Angel NOUEL told Dwayne PERSON that he would find out what happened and call Dwayne PERSON back. I believe that when Dwayne PERSON used the term "blowing up," he referred to several telephone calls received over Target Telephone #4 from potential drug customers who are seeking to obtain drugs from him. I further believe that when Dwayne PERSON told Miguel Angel NOUEL that he has "gotta eat," Dwayne PERSON meant that he needed to obtain drugs in order to make money by selling them to the customers who had been

calling Target Telephone #4.

142. On August 21, 2010, monitors intercepted several conversations between Dwayne PERSON and Ryan MORRIS whom agents believe re-supplied Dwayne PERSON with cocaine. The re-supply was arranged by a series of telephone calls that started on August 9, 2010, when Dwayne PERSON used Target Telephone #4 to call the Morris Phone, and asked Ryan MORRIS, "Can you put something together for me?" Eleven days later, on August 20, 2010, at approximately 9:39 AM, Ryan MORRIS called Dwayne PERSON on Target Telephone #4 to ask him whether he was "situated, and trying to do something?" Ryan MORRIS said that he would "kick it with you," which I interpreted to mean that Ryan MORRIS was ready to supply Dwayne PERSON.

143. The next day, on August 21, 2010, at approximately 2:43 PM, monitors intercepted a call from Ryan MORRIS on the Morris Phone to Dwayne PERSON, during which Ryan MORRIS told Dwayne PERSON that he was "about to come in." Agents believe that Ryan MORRIS alerted Dwayne PERSON to the fact that he had the cocaine and was driving towards Dwayne PERSON's residence at 8 Peacevale Road, Dorchester.

144. At approximately 4:42 PM that afternoon, Ryan MORRIS called Target Telephone #4 again from the Morris Phone, and told

Dwayne PERSON that he was "about to go get it and come right now." Five minutes later, at approximately 4:47 PM, Dwayne PERSON received a call on Target Telephone #4 from a person believed to be a customer, calling from telephone number 857-236-1087, with no subscriber information available ("UM1087"), who said that he was, "checking you out, seeing what's good." Dwayne PERSON, still waiting to be re-supplied, said, "Nah, I'm just sitting here. Still waiting on it." UM1087 said, "OK, alright." I believe that the customer was waiting for Dwayne PERSON to get re-supplied so that he could purchase some cocaine.

145. Not long afterward, at approximately 5:07 PM, Ryan MORRIS called Dwayne PERSON on Target Telephone #4 and said, "Hey. I'm on the porch." Dwayne PERSON replied, "Alright." Surveillance agents were stationed nearby, and observed Ryan MORRIS arrive at Dwayne PERSON's residence at 8 Peacevale Road at approximately 5:09 PM in a beige/grey Chevrolet Tahoe SUV, bearing Massachusetts registration 311FY6, which is registered in the name of Ryan MORRIS, 17 Angelo Street, Brockton, Massachusetts (the Chevy Tahoe"). Agents observed Ryan MORRIS exit the driver's side of the Chevy Tahoe carrying a small black plastic bag. He walked up the stairs to the porch of 8 Peacevale Road and sat on a chair there. Agents next observed Ryan MORRIS at approximately 6:13 PM, when he walked away from 8 Peacevale Road carrying a larger silver bag, and entered the Chevy Tahoe.

Agents believe that the bag contained money that Dwayne PERSON paid Ryan MORRIS for the cocaine that Ryan MORRIS delivered.

Dwayne PERSON Negotiated Cocaine Transaction With Kervin PENA

146. On September 7, 2010, at approximately 2:36 PM, monitors intercepted a call to Dwayne PERSON from telephone number 617-735-5226, subscribed to in the name of Pablo Gutierrez, 12 Pearl Street, Fitchburg, Massachusetts, used by Kervin PENA of 67 Washington Street, Apartment 11, Dorchester, Massachusetts ("Target Telephone #6"). They had the following conversation:

Dwayne PERSON: What's up money?

Kervin PENA: What's going on brother?

Dwayne PERSON: Nothing, money. Just chillin' that's all.

Kervin PENA: You chillin', chillin' bro?

Dwayne PERSON: Huh?

Kervin PENA: So, what's going on? How's everything?

Dwayne PERSON: Ok, you know, (U/I).

Kervin PENA: Is that right?

Dwayne PERSON: Yeah.

Kervin PENA: Hey, Um, they just called me. They you know got some nice, nice, nice, nice good stuff. Know what I'm saying?

Dwayne PERSON: So, what's the digits?

Kervin PENA: He said "34."

Dwayne PERSON: Oh, too much.

Kervin PENA: Too much?

Dwayne PERSON: Yeah.

Kervin PENA: How much you get it now?

Dwayne PERSON: I'm gettin' it for 32.

Kervin PENA: 32? Damn, You got a connection, Bro. You know?

Dwayne PERSON: Yeah. Huh, you know how it is sometimes.

Kervin PENA: Yeah, yeah, yeah, I know, I know. How you been working out? You know sometime, sometime yo people gotta (U/I) sometime ya know. You know what I'm saying?

Dwayne PERSON: Yeah, that's alright too.

Kervin PENA: If there's anything you need help, bro, you know.

Dwayne PERSON: ok.

Kervin PENA: I'm around. You know what I mean.

Dwayne PERSON: Alright.

I believe that Dwayne PERSON rejected Kervin PENA's offer to sell him kilograms for \$34,000 because he could get the kilograms for \$32,000.

147. On September 9, 2010, at approximately 5:22 PM, Dwayne PERSON received a telephone call over Target Telephone #4 from Ryan MORRIS, who used the Morris Phone. Monitors intercepted the following conversation:

Dwayne PERSON: What's up?

Ryan MORRIS: You, hey. Hey, let me know when, when you out here again.

Dwayne PERSON: Ah, why you need all that?

Ryan MORRIS: Yeah, somebody, one time, I'm just waiting, 'cause, 'cause he want something. I, I need the other one.

Dwayne PERSON: Oh, OK, I about to (U/I). Let me get that one

back and I need two back.

Ryan MORRIS: Hehe, for real? The problem is. I already cut it all, you know?

DWAYNE PERSON: Oh, OK.

Ryan MORRIS: Yeah, everything, that's why I'm weighing the number out. Alright, just hit me up though.

Dwayne PERSON: Um hum.

Ryan MORRIS: Alright.

I believe that Dwayne PERSON sold Ryan MORRIS some cocaine, and Dwayne PERSON needed some back ("I need two back"), but Ryan MORRIS had already cut it for distribution ("I already cut it").

148. Not long afterward, at approximately 6:56 PM, monitors intercepted a call to Dwayne PERSON from Michael COKE, who used using telephone number 857-236-5581, subscribed to in the name of [REDACTED], and believed to be used by [REDACTED]. During the conversation, [REDACTED] asked what Dwayne PERSON could sell him. Dwayne PERSON said, "a Benz, same as before."

149. That evening monitors intercepted a call on Target

Telephone #4 was from Dwayne PERSON to Target Telephone #6.

Dwayne PERSON spoke to Kervin PENA:

Dwayne PERSON: What up, Cutty?

Kervin PENA: What's going on brother?

Dwayne PERSON: What's the deal?

Kervin PENA: I'm chillin three, man.

Dwayne PERSON: Can you get a Benz?

Kervin PENA: (background "that's 500"). Oh, you need about five?

Dwayne PERSON: Yeah.

Kervin PENA: Oh, we don't do that Bro.

Dwayne PERSON: Ok, that's ok. Ain't no problem.

Kervin PENA: that's alright. You know what I'm saying. They don't like to do that.

I believe that [REDACTED] wanted to purchase 500 grams (a half kilogram) from Dwayne PERSON, so Dwayne PERSON called Kervin PENA to ask if he had that amount ("can you get a Benz?"). PENA said that they don't deal in half kilos ("Oh, we don't do that.")

Dwayne PERSON and Ryan MORRIS Split A Kilogram Of Cocaine From Kervin PENA

150. On September 10, 2010, at approximately 4:06 PM, monitors intercepted a conversation between Dwayne PERSON on Target Telephone #4 and Ryan MORRIS on the Morris Phone. The two debated the current cost of a kilogram of cocaine. Ryan MORRIS said he could get a kilogram for "36." Dwayne PERSON responded that Ryan MORRIS's man was "rapin'" him. Dwayne PERSON said he could get a kilogram for "34" (most likely referring to the quote that Dwayne PERSON got from Kervin PENA for \$34,000 per kilogram). At the end of the conversation, Dwayne PERSON said "Hang tight and right." Ryan MORRIS responded, "Yo, let me know, 'cause I um, I probably do something with ya." I believe that Dwayne PERSON and Ryan MORRIS planned to split an amount of cocaine.

151. At approximately 6:08 PM, monitors intercepted a conversation between Ryan MORRIS on Morris Phone and Dwayne PERSON during which Dwayne PERSON told Ryan MORRIS that his "man" (referring to Kervin PENA) wouldn't supply 500 grams because he "doesn't split it". So, Dwayne PERSON and Ryan MORRIS discussed splitting a kilogram of cocaine between themselves. Dwayne PERSON asked Ryan MORRIS: "you got enough (money) to split?" Ryan MORRIS responded, "I could do it, 'cause, I could do it." Dwayne PERSON asked Ryan MORRIS if he wanted to do it "in the

morning."

152. At approximately 6:36 PM, monitors intercepted a call from Dwayne PERSON to Kervin PENA on Target Telephone #6, during which Dwayne PERSON asked Kervin PENA, "Hey, could you be ready for me tomorrow?" Kervin PENA responded, "Ah, well, like at what time? Early in the morning?" They agree to meet early in the morning.

153. On September 11, 2010, at approximately 11:17 AM, Dwayne PERSON called Ryan MORRIS on the Morris Phone. Ryan MORRIS said that he would "be there in about an hour." Dwayne PERSON said that, "I ain't going to call him until you come in." Ryan MORRIS said, Alright, ... just tell him to get ready."

154. At approximately 1:51 PM Dwayne PERSON received a call from Target Telephone #6, and spoke to Kervin PENA, who said "I forgot about you. ... Do you want me to make the call now and see what we can do?" Dwayne PERSON said, "Please."

155. On September 12, 2010, at approximately 2:29 PM, Kervin PENA called Dwayne PERSON and told him that he would be there in "an hour." Dwayne PERSON called Ryan MORRIS at approximately 2:30 PM, and told him, "He say about an hour." Ryan MORRIS said, "Alrighty."

156. Based on the previous conversations between Dwayne PERSON and Ryan MORRIS, as well as Dwayne PERSON and Kervin PENA, agents anticipated that Kervin PENA would supply Dwayne PERSON (and Ryan MORRIS) with a kilogram of cocaine.

157. Agents established surveillance at approximately 2:45 PM in the area of Dwayne PERSON's residence at 8 Peacevale Road, Dorchester. At approximately 3:58 PM, Kervin PENA arrived in a blue Infiniti, bearing Massachusetts registration 762HC7, registered in the name of [REDACTED]

[REDACTED] (the "Blue Infiniti").

Kervin PENA entered 8 Peacevale Road carrying a white cardboard box. Surveillance agents positively identified Kervin PENA by comparing the person who carried the cardboard box to an RMV photo on a Massachusetts license bearing Kervin PENA's name, 16 Stellman Road, First Floor, Roslindale, Massachusetts. At the same time, surveillance agents observed a red Volvo, bearing Rhode Island registration 606601, registered in the name of [REDACTED]

[REDACTED] (the "Red Volvo"),

arrive at 8 Peacevale Road. The Red Volvo was driven by a Hispanic male who remained in the car, and parked on an adjacent street. Agents identified the driver of the Red Volvo as [REDACTED] by comparing him to a booking photograph for a Hispanic male named [REDACTED]

158. At approximately 4:18 PM, agents observed Ryan MORRIS arrive at 8 Peacevale Road in a grey GMC Yukon, bearing Massachusetts registration 311FY6, registered in the name of Ryan Morris, 17 Angelo Street, Brockton, Massachusetts (the "Grey Yukon"). MORRIS got out of the Grey Yukon, and entered 8 Peacevale Road. At approximately 4:50 PM, Ryan MORRIS emerged from 8 Peacevale Road, and re-entered the Grey Yukon, and departed from the area. At approximately 5:00 PM, the Red Volvo returned to 8 Peacevale Road. Kervin PENA emerged from 8 Peacevale Road at approximately 5:00 PM, carrying a clear plastic bag that contained a box. Kervin PENA placed the bag, believed to contain currency, into the Red Volvo, which then departed. Kervin PENA re-entered the Blue Infiniti and departed at the same time as the Red Volvo.

159. At approximately 7:35 PM, monitors intercepted a call from Dwayne PERSON to Ryan MORRIS. Dwayne PERSON asked Ryan MORRIS "how are the movies?" Ryan MORRIS said, "Perfect. The movie started at 5, then to 820, brother." Agents believe that Ryan MORRIS reported to Dwayne PERSON that he had cut the 500 grams of cocaine into 820 grams of cocaine.

160. On September 18, 2010, at approximately 8:40 PM, monitors intercepted a call to Target Telephone #4 from Target Telephone #6. Dwayne PERSON and Kervin PENA had the following

conversation:

Dwayne PERSON: What's the deal, man?

Kervin PENA: What's going on man?

Dwayne PERSON: What you been doin'?

Kervin PENA: Nothin' man, chillin', you know.

Dwayne PERSON: Ah, your Boy still around?

Kervin PENA: Yeah.

Dwayne PERSON: Oh, OK. I might hit you up tomorrow or do something.

Kervin PENA: Alright, so, ah, yeah. Hit me up tomorrow early. That way I could call him.

Dwayne PERSON: Yeah, OK.

Kervin PENA Supplied Dwayne PERSON With Two Kilograms of Cocaine

161. On September 19, 2010, starting at approximately 10:44 AM, monitors intercepted a series of calls between Dwayne PERSON on Target Telephone #4, and Kervin PENA on the Pena Phone, each of which was intended to set the time and place for a meeting where Kervin PENA could deliver cocaine to Dwayne PERSON. For

example, at approximately 11:53 AM, Kervin PENA called Dwayne PERSON and told him, "He gonna be late ... about like an hour." At approximately 12:28 PM, Kervin PENA called Dwayne PERSON and said, "they just called me right now. They on the way, ok?" At approximately 2:34 PM, Kervin PENA called Dwayne PERSON and said, "I'm about to be there now."

162. Surveillance agents were located in the area of Dwayne PERSON's residence at 8 Peacevale Road. At approximately 2:39 PM, agents observed PENA's arrival at 8 Peacevale Road in a blue Volkswagen Passat, bearing Massachusetts plates 64RV81, registered in the name of [REDACTED] [REDACTED] (the "Blue Passat"). At approximately 2:52 PM, agents observed the arrival of the Red Volvo. The Red Volvo parked on Norfolk Street.

163. At approximately 4:32 PM, surveillance agents observed the Blue Passat pull away from the front of 8 Peacevale Road and pull up next to the Red Volvo. Agents observed Kervin PENA hand a black plastic bag, which agents believed contained money, to [REDACTED] in the Red Volvo, then re-enter the Blue Passat and depart from the area. Agents followed the Red Volvo into Rhode Island before losing it in traffic.

164. On September 21, 2010, at approximately 6:29 PM,

monitors intercepted a call on Target Telephone #4 from Dwayne PERSON to the Pena Phone. Dwayne PERSON ordered two kilograms of cocaine from Kervin PENA:

Kervin PENA: What's up?

Dwayne PERSON: McGillicuddy.

Kervin PENA: What's going on?

Dwayne PERSON: You talk to your bigs yet?

Kervin PENA: Yeah. They say they set up for the next round.

Dwayne PERSON: Maybe next round?

Kervin PENA: Yeah. I probably (U/I) you know what I'm saying.

Dwayne PERSON: Well. ... I'm going to need, I'm going to need one tomorrow. Two tomorrow.

Kervin PENA: Two tomorrow?

Dwayne PERSON: Yeah.

Kervin PENA: Alright.

165. On September 22, 2010, surveillance agents established

surveillance at 8 Peacevale Road, and observed Kervin PENA arrive at approximately 5:00 PM in a blue Saab bearing Massachusetts plates 762HC7, registered in the name of, [REDACTED] [REDACTED] (the "Blue Saab"). At approximately 6:02 PM, agents believe (though due to his clothing cannot confirm) that [REDACTED] drove the Red Volvo. At approximately 6:30 PM, Kervin PENA emerged from 8 Peacevale Road carrying a black plastic bag and entered the Red Volvo. Moments later, Kervin PENA got out of the Red Volvo (without the bag), and re-entered 8 Peacevale Road. Approximately two minutes later the Red Volvo departed from the area.

166. At approximately 6:45 PM, surveillance agents observed Kervin PENA emerge from 8 Peacevale Road and drive away in the Blue Saab.

167. Based on the intercepted conversations the previous evening, combined with their surveillance observations, I believe that Kervin PENA delivered two kilograms of cocaine to Dwayne PERSON, and retrieved a bag of money that was given to [REDACTED] [REDACTED]

168. On October 8, 2010, at approximately 11:49 AM, monitors intercepted a call from Kervin PENA, who called to discuss the

prices of kilograms of cocaine. During the call, Dwayne PERSON claimed to be able to purchase cocaine for "30" (\$30,000 per kilogram). Kervin PENA was disbelieving, and said to Dwayne PERSON: "Damn bro ... that's the price I got right now ... I got three." Kervin PENA also suggested that Dwayne PERSON could get a quantity discount: "Yeah, so, um, I'm saying, probably if you do a couple together, we do something, something better." Dwayne PERSON responded, "Hey, ok, well," and then ended the call.

169. On October 17, 2010, at approximately 1:46 PM, Dwayne PERSON received a call from Michael WILLIAMS, during which Dwayne PERSON told Michael WILLIAMS that he would, "get with you in a little bit." At approximately 4:50 PM, monitors intercepted a call from Dwayne PERSON to Michael WILLIAMS during which Dwayne PERSON said, "I'm right around the corner." ... I'll be right there. I believe that Dwayne PERSON delivered to Michael WILLIAMS a quantity of cocaine.

170. On October 19, 2010, at approximately 7:06 PM, monitors intercepted a call to Target Telephone #4 from Michael WILLIAMS on Target Telephone #3, who complained about the quality of one of the kilograms he had just purchased from Dwayne PERSON:

Michael WILLIAMS: You around?

Dwayne PERSON: Yeah.

Michael WILLIAMS: Yeah, I didn't like one of them things, one of them things. But I'll come and talk to you face to face.

Dwayne PERSON: Ok.

Dwayne PERSON Purchased Cocaine From Anastacio LOPEZ and Sold It To Eydris ADAMS

171. On October 23, 2010, at approximately 3:48 PM, Dwayne PERSON received a call from telephone number 617-337-6035, subscribed to in the name of Born Allah, PX Box 54988, Irvine, California, and used by Eydris ADAMS. Dwayne PERSON said that he "got it already, cuddy. Whenever you ready."

172. At approximately 4:19 PM, monitors intercepted a call from Dwayne PERSON to Anastacio LOPEZ, during which Dwayne PERSON ordered 500 grams of cocaine:

Dwayne PERSON: ... You still got that ah, ah,

Anastacio LOPEZ: That BMW, yeah.

Dwayne PERSON: that BMW?

Anastacio LOPEZ: This 750. It's nice.

Dwayne PERSON: Nah, but I'm talking about the other one.

Anastacio LOPEZ: The Benz?

Dwayne PERSON: Yeah.

Anastacio LOPEZ: Yeah, that's still here.

Dwayne PERSON: Okay. I need that Cutty.

Anastacio LOPEZ: OK. ... Alright. So when you come home, I'm drive up there with it.

173. Based on the investigation, I know that Anastacio LOPEZ and Dwayne PERSON referred to 500 grams as a "Benz" and 750 grams as a "BMW." I believe that Dwayne PERSON ordered 500 grams from Anastacio LOPEZ, so that Dwayne PERSON could sell it to Eydris ADAMS.

174. At approximately 4:29 PM, monitors intercepted a call from Dwayne PERSON to Anastacio LOPEZ, during which Dwayne PERSON said he was at the house. At 5:35 PM, surveillance agents saw Dwayne PERSON pull down the driveway to the rear of 60 Thetford Avenue, Dorchester, Massachusetts.

175. While Dwayne PERSON was at 60 Thetford Avenue picking up cocaine from Anastacio LOPEZ, surveillance agents observed, at approximately 4:38 PM, an unidentified male standing on the porch of Dwayne PERSON's residence at 8 Peacevale Road. The male had exited from a 2007 Toyota Tundra, bearing Massachusetts

registration 79FP84, registered to Eydris ADAMS, 71 Sawyer Avenue, Dorchester, Massachusetts. Surveillance agents observed the male use his cell phone to make calls. Monitors intercepted those calls on Dwayne PERSON's telephone (Target Telephone #4). The surveillance agent obtained a license photograph for Eydris ADAMS and compared it to the person he had seen on the porch and determined that Eydris ADAMS was the male on Dwayne PERSON's porch.

Miguel Angel NOUEL Delivered 5 Kilograms of Cocaine To Dwayne PERSON

176. On November 2, 2010, at approximately 3:50 PM, Dwayne PERSON placed a telephone call over Target Telephone #4 to the Nouel Phone, and spoke to Miguel Angel NOUEL. The two agreed to speak later.

177. At approximately 5:56 PM, Dwayne PERSON placed a call over Target Telephone #4 to the Nouel Phone and told Miguel Angel NOUEL that he, Dwayne PERSON, would get dropped off near the place that Miguel Angel NOEL was located. I believe that Miguel Angel NOUEL and Dwayne PERSON met to arrange a drug transaction.

178. On November 6, 2010, at approximately 6:27 PM, monitors intercepted the following conversation between Dwayne PERSON on Target Telephone #4 and Noel WILLIAMS of 12 Nottingham Street, Dorchester, Massachusetts, who is one of Dwayne PERSON's

customers. Noel WILLIAMS used telephone number 617-230-7938, subscribed to in the name of Noel Williams, 12 Nottingham Street, Apartment 12A:

Noel WILLIAMS: Yo, but ah, how we looking, uh, uh?

Dwayne PERSON: Ahh, well he was, he called me the other day, I didn't call him back, so I was like yo, you know. I was like everybody on vacation, you know what I mean? That's what I told him.

Noel WILLIAMS: Yeah, I'm 'bout to. I'm getting ready to go out tonight, so I'm 'bout to be peeking."

Dwayne PERSON: Okay, well let me know when you're ready, know what I'm saying?

Noel WILLIAMS: Alright.

Dwayne PERSON: Alright.

179. I believe that Dwayne PERSON told Noel WILLIAMS that he called his source of cocaine supply, but has yet to hear back from him because Dwayne PERSON told his source that "everybody on vacation."

180. Later that evening, at approximately 7:25 PM, Dwayne

PERSON received a telephone call over Target Telephone #4 and had the following conversation with Noel WILLIAMS:

Dwayne PERSON: What up (unintelligible)?

Noel WILLIAMS: Yo.

Dwayne PERSON: Yo.

Noel WILLIAMS: Listen, one of my friends, one of my big friends called me a few minutes ago.

Dwayne PERSON: One of your big friends called you two minutes ago?

Noel WILLIAMS: Yeah.

Dwayne PERSON: Huh?

Noel WILLIAMS: Tell me something.

Dwayne PERSON: Huh?

Noel WILLIAMS: Can you, can you go to the party tonight?

Dwayne PERSON: Ahh, well I'm at my daughter's 18th birthday, if I don't get back too late, I can you know. You know what I mean.

Noel WILLIAMS: Yeah, yeah, ah you think you're gonna get back too late?

Dwayne PERSON: I can do it tomorrow though, just say tomorrow, I ain't gonna say today.

Noel WILLIAMS: Alright, I'm ah, alright I'm see if he's gonna wait for me.

Dwayne PERSON: Okay.

Noel WILLIAMS: Alright.

Dwayne PERSON: Okay.

Noel WILLIAMS: Alright.

I believe that Noel WILLIAMS asked Dwayne PERSON to assist him in picking up a quantity of cocaine ("got to the party tonight").

181. On November 7, 2010, at approximately 12:08 PM, Dwayne PERSON received a telephone call over Target Telephone #4 from the Nouel Phone and spoke to Miguel Angel NOUEL, who told Dwayne PERSON that he, Miguel Angel NOUEL, was on the way back, and they had "five mushrooms on the pizza." Miguel Angel NOUEL stated that he was on the bus and they could meet tomorrow (November 8, 2010). I believe that "five mushrooms" is code for five

kilograms of cocaine. I further believe that Miguel Angel NOUEL arranged to sell five kilograms of cocaine to Dwayne PERSON.

182. At approximately 4:55 PM Dwayne PERSON placed a telephone call over Target Telephone #4 to the Nouel Phone and asked Miguel Angel NOUEL, "where you, front, back, the side?" Miguel Angel NOUEL replied, "I'm in the front." Later that evening, surveillance agents observed Miguel Angel NOUEL and Dwayne PERSON meet at Cappy's Pizza on Centre Street in Jamaica Plain. I believe that Miguel Angel NOUEL met with Dwayne PERSON to continue negotiations for a drug transaction.

183. On November 8, 2010, at approximately 9:00 AM, Miguel Angel NOUEL called Dwayne PERSON and asked, "are we gonna do the thing?" Dwayne PERSON replied, "I don't know cutty, you know what I mean?" Miguel Angel NOUEL replied, "fifty dollars," and Dwayne PERSON said, "thought you said you don't need no dollars?" Miguel Angel NOUEL replied, "naw, that's for the other fifty dollars." The two agreed to speak later. I believe that Dwayne PERSON needs to get \$50,000 together to pay off a drug debt before he could obtain the additional kilograms of cocaine from Angel NOUEL.

184. On November 9, 2010, monitors intercepted a series of Dwayne PERSON's conversations concerning the fact that his (Dwayne PERSON's) source of cocaine supply wouldn't be ready

until the following day (November 10, 2010). At approximately 6:59 PM, Dwayne PERSON received an incoming call from the Nouel Phone and spoke to Miguel Angel NOUEL, who told Dwayne PERSON that he was 40 minutes away and would see Dwayne PERSON "tonight or tomorrow, early morning."

185. On November 10, 2010, at approximately 9:49 AM, Dwayne PERSON called Miguel Angel NOUEL and asked, "You here or down there?" Miguel Angel NOUEL stated that he was, "here," and would call Dwayne PERSON back. At approximately 10:17 AM, monitors intercepted a call to Dwayne PERSON from Miguel Angel NOUEL, who said, "I'm coming." At approximately 10:35 AM, surveillance agents, located in the area of Miguel Angel NOUEL's residence at 302 Centre Street, Apartment #1 saw Dwayne PERSON arrive there in a green 1998 Oldsmobile minivan, bearing Massachusetts registration number 5EE590, registered in the name of Dwayne PERSON, 8 Peacevale Road, Dorchester, Massachusetts (the "Green Minivan"), and meet with Miguel Angel NOUEL. Surveillance agents observed Miguel Angel NOUEL hand a black duffel bag to Dwayne PERSON through the driver's side window of the Green Minivan.

Dwayne PERSON Was Arrested An Incarcerated At Nashua Street Jail

186. Moments later, surveillance agents followed Dwayne PERSON out of the area to Wyman Street, where he was stopped.

Agents observed the black duffel bag in the middle seat. Agents seized the black duffel bag, which contained 5 wrapped kilograms of a white powdery substance that field-tested positive for cocaine hydrochloride. The kilograms have been submitted to the DEA Northeast Laboratory for further analysis. Boston Police officers arrested Dwayne PERSON and read him his Miranda rights. Dwayne PERSON said to the arresting officers, "I'm fucked." He is currently in state custody pending trial on cocaine trafficking charges in Suffolk County.

187. During his incarceration at the Nashua Street Jail, Dwayne PERSON has made a number of telephone calls to his wife, Beverly PERSON, all of which have been recorded consistent with jail policy (a policy of which all inmates are informed in writing and orally). For example, during one such conversation on November 11, 2010, the day after his arrest, Beverly PERSON asked Dwayne PERSON whether "it was everything?" Dwayne PERSON said, "Yeah." Dwayne PERSON instructed Beverly PERSON to contact a number of his associates because "they owe." Dwayne PERSON also asked Beverly PERSON to contact his "Boy," believed to be Miguel Angel NOUEL, and "Valentin's son," believed to be Anastacio LOPEZ. Beverly PERSON asked Dwayne PERSON, "Is there anything here?" Dwayne PERSON replied, "In the ice cubes." Beverly PERSON said, "no, I mean the money." Dwayne PERSON replied, "No, Dennis (referring to his brother, Dennis Person)

has it." In a later call on November 13, 2010, Beverly PERSON told Dwayne PERSON that his "boy" (Anastacio LOPEZ) wanted a copy of the police report. During that conversation, Dwayne PERSON gave Beverly PERSON explicit directions to get to 60 Thetford Avenue. Dwayne PERSON also directed her to contact "E" (believed to be Eydris ADAMS), and tell him to go see "Valentin's son" (believed to be Anastacio LOPEZ). On November 15, 2010, during a call between Dwayne PERSON and Beverly PERSON, she reported to Dwayne PERSON that she "hadn't heard shit from the street", and warned Dwayne PERSON that "that his brother (Dennis Person) better be on point." On November 16, 2010, Dwayne PERSON called Beverly Person, who reported that she had still not heard from "Valentin's son" (Anastacio LOPEZ). In a later call, Beverly told Dwayne PERSON that "Valentin's son" had come to visit her, and "the number was 10." Dwayne PERSON told her that she had to do things "like a drill sergeant." He also instructed her to get money from "HeyHey" (agents believe that is Miguel Angel NOUEL) because he "owed sixteen-five (\$16,500). Next, Dwayne PERSON instructed Beverly to contact [REDACTED], [REDACTED] and "his brother." Dwayne PERSON then suggested that she should have "Dennis" contact them. Beverly PERSON asked, "Why, they owe?" Dwayne PERSON said yes, "both of them." Beverly PERSON told him that people have responded when she texted them. Dwayne PERSON said that was because of her "aggressiveness," and because people

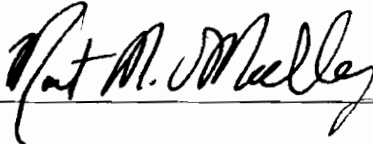
know "she is not playing games." Dwayne PERSON told Beverly PERSON to rely on "E" (Eydris ADAMS) to be the "enforcer of the bullshit". The gist of these and several other taped conversations over the period between November 13, 2010, and November 18, 2010, showed that Dwayne PERSON instructed Beverly PERSON how, and from whom, to collect his drug proceeds.

188. On November 23, 2010, Dwayne PERSON called Beverly PERSON, who handed the phone to Eydris ADAMS. Dwayne PERSON asked him to contact "Muscle Mike" (Michael WILLIAMS) to see if he would help out Dwayne PERSON with bail money. Eydris ADAMS said that he would go meet with Michael WILLIAMS.

189. Based on the foregoing, I submit that there is probable cause to believe that from in or about July, 2009, to on or about December 2, 2010, Eydris ADAMS, a/k/a "E", Debra BROWN, Frank COPELAND, George LEARY, Ramon LOMAX, Anastacio LOPEZ, Anthony MADDEN, Jerome MARION, Nicole MOORE, Ryan MORRIS, Miguel Angel NOUEL, Kervin PENA, Beverly PERSON, Dwayne PERSON, Shawn WALKER, Donald WILLIAMS, Noel WILLIAMS, and Michael WILLIAMS did knowingly and intentionally combine, conspire, confederate and agree with each other and with others unknown to possess with intent to distribute and distribute more than 500 grams of cocaine and more than 280 grams of cocaine base, in violation of Title 21 United States Code, Sections 841(a)(1), 841(b)(1)(B)

and 846.

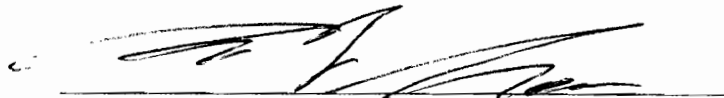
Signed under the pain and penalties of perjury this 1st day
of December 2010.

A handwritten signature in black ink, appearing to read "Mart M. Malley", written over a horizontal line.

MARTIN M. O'MALLEY

Task Force Officer, DEA

Sworn and subscribed to before me this 1st day of December
2010 at Boston, Massachusetts.

A handwritten signature in black ink, appearing to read "Leo T. Sorokin", written over a horizontal line.

LEO T. SOROKIN

UNITED STATES MAGISTRATE JUDGE